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Editor-in-Chief: VICTOR G. ROSENBLUM
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Managing Editor: JOSEPH DUCOEUR
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Associate Managing Editor: EDWIN S. ROCKEFELLER
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WILLIAM F. SCHULZ, JR.
University of Pittsburgh Law School, Pittsburgh 13, Pa.

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CHAIRMAN'S PAGE

The Chicago Midwinter meeting of the Council of the Section of Administrative Law demonstrated conclusively that most of the Section's committees have developed active, useful programs this year. Approximately 600 Section members are engaged in this committee work. All of this activity promises lively, heavily scheduled business sessions during the forthcoming Annual Meeting in Washington.

Bernard J. Gallagher, Chairman of our Annual Meeting Committee, has arranged two excellent program sessions. On Monday morning, August 29, Chief Judge E. Barrett Prettyman, of the U. S. Court of Appeals for the District of Columbia, will moderate a session on administrative law developments around the world. His panelists will include Ambassador Chiriboga of Ecuador (a former teacher of international and comparative law at Louisiana State University), Professor H. W. R. Wade, Trinity College, Cambridge, England (speaking about Great Britain's Council on Tribunals) and other Ambassadors from Asiatic, African and European nations.

There will be Section business sessions that afternoon and on Tuesday morning, August 30. On Tuesday afternoon Justice Tom C. Clark will address the Section on an administrative law topic.

I am particularly pleased that these two distinguished American jurists will honor us by making significant contributions to our annual program. No lawyer or judge in the United States has made greater contributions toward improvement of Federal administrative law than has Judge Prettyman. His leadership in that respect is generally recognized by the bar both in and out of Government. Mrs. Justice Clark has exercised an equally critical leadership role in the general field of improving the administration of justice at both the State and Federal levels. Last year he was Chairman of the ABA's Section of Judicial Administration. That Section responded with unusual growth in membership and in new, vital programs.

Judge Irving R. Kaufman's provocative, frank and well-reasoned article in this issue of the Bulletin introduces another outstanding Federal Judge who is devoting much thought and effort to the improvement of Federal administrative law. Surely the examples

of these judges should spur all of us in the Section of Administrative Law to greater effort in our Section's mission—improving the administrative process at both the State and National levels.

Some in our Section do not need further encouragement; they are demonstrating by word and deed their own awareness of the Section's responsibilities to the bench and bar of America. For example, Jesse E. Baskette, Chairman of our Committee on Hearing Examiners, has done an enormous amount of work in that capacity this year. His article in the current Bulletin gives but a partial indication of the many activities of his committee this year. One wonders when he finds time for the more mundane work of his Washington firm.

Another fine job in the best traditions of this Section has been accomplished by our Committee on the Federal Register, of which Washington lawyer A. Alvis Layne is Chairman. Almost singlehandedly, Mr. Layne has developed the ambitious program for improving the Federal Register and the Code of Federal Regulations, described elsewhere in the Bulletin. Mr. Layne and the Section are indebted to Section member Norman J. Futor, Council member J. Earl Cox, and Amy R. Jennings, Librarian of the Federal Trade Commission, for important assistance on this project.

This committee activity must be continued and even intensified next year. Therefore, I have requested that our Committee on Coordination, which consists of Whitney R. Harris, Chairman, Frank C. Newman and Harold L. Russell, serve also this year as an ad hoc Committee on Committees. Our capable, hard-working Secretary, Elizabeth C. Smith, also will serve ex officio as a member of this committee. If you have any suggestions concerning committee membership or leadership, or committee structure or projects for next year, please do not hesitate to write Mr. Harris at Southwestern Bell Telephone, Dallas 2, Texas.

Many of you who know of my efforts during the past few years to increase the Section's membership, to encourage broader member participation in the Section's work, and to balance voluntary improvement with legislative proposals in the Section's program, will know with what feeling I say: "See all of you at the Willard Hotel in August!"

EARL W. KINTNER, *Chairman*

PROBLEMS IN KEEPING TRACK OF AGENCY RULES: THE WORK OF THE COMMITTEE ON THE FEDERAL REGISTER

By A. Alvis Layne

The object of the Committee is to study the Federal Register and Code of Federal Regulations for the purpose of determining whether these publications are presently meeting the need of the legal profession for notice and compilation of orders, rules, regulations, requirements and other actions or proposed actions of the agencies of the Federal government. This involves, it seems to the Committee, a complex of matters, including content, format, editorial style, indexing, frequency of publication, distribution, and costs. It is the purpose of the Committee to obtain and study available and relevant information and informed opinion on these matters; to report to the Chairman and Council a summary of the information and opinion obtained, together with any conclusions and recommendations which appear to the Committee to be warranted.

A. Activities of the Committee

The Committee or its Chairman has interviewed a number of persons—lawyers and non-lawyers—regarding the Federal Register and the Code of Federal Regulations. Without exception, those interviewed have given generously of their time and knowledge. The Committee has been particularly assisted by Mr. David C. Eberhart, Director, Office of the Federal Register, and the members of that office; Mr. Norman J. Futor, author of "47 Steps Are Too Many," 45 ABA Journal No. 1, p. 43 (January 1959); and by Miss Amy R. Jennings, Librarian of the Federal Trade Commission.

The Committee in December, 1959 distributed to the members of the Administrative Law Section a questionnaire designed to elicit information and comment concerning the Federal Register and Code of Federal Regulations. 2,093 questionnaires were mailed. As of February 19, 1960, 603 or approximately 28.8% had been returned, many with extended comment. There is attached to this report a tabulation of the answers. The time and

effort taken by many of the members to consider and reply to the questionnaire deserve especial note and appreciation. The responses, as shown in the attached tabulation, contain much pertinent and interesting information and comment, and will be helpful in reaching a reliable conclusion on the matters under study.

Comment of the Committee

This interim report is not intended to set out conclusions or final recommendations. Such conclusions and recommendations should come only after a careful study of all available materials and data. It is apparent, however, that a number of members of the legal profession are not familiar with the Federal Register and Code of Federal Regulations. There is therefore appended to this Report a statement describing these publications.

Examination of the responses to Question 9 of the questionnaire discloses that, because of the difficulty of the subject and the ineptness of the question, the responses are not easily interpreted. It is apparent that loose-leaf publication processes—the subject of Question 9—should be further pursued.

Proposed Activities of the Committee

The Committee proposes (1) to have further extensive conferences with interested persons, including the Director and staff members of the Federal Register and other government departments; (2) to encourage the preparation by a law librarian of a report on the use of loose-leaf services, and a bibliography of technical papers written in this field; (3) to circulate a further questionnaire to the members of the Section who responded to Question 9 of the initial questionnaire; and (4) to prepare a final report for the meeting of the Council scheduled for August, 1960.

B. Authorization, Purpose and Availability of FR and CFR

The Federal Register is published daily under the Federal Register Act, 44 U.S.C.A. § 301-§ 314. It contains, under the provisions of § 305, (1) all Presidential proclamations and Executive orders, except such as have no general applicability, etc.; (2) such documents or classes of documents as the President shall determine from time to time have general applicability and legal effect; (3) such documents or classes of documents as may be required to be published by Act of Congress.

The Administrative Procedure Act, 5 U.S.C.A. § 1002 and § 1003, requires all agencies to publish certain information and notices in the Federal Register.

Some of the provisions of the Federal Register Act have an important bearing on the manner in which it shall be published and used, and must be given consideration in making recommendations for or against suggested changes: e.g.,

> § 303 provides that it shall be issued daily and contain all documents filed up to a fixed "time of the day immediately preceding the day of distribution."
> § 306 establishes an Administrative Committee to prescribe regulations "for carrying out the provisions of this chapter: including the number of copies which shall be available for distribution to the public, and the prices to be charged."
> § 307 provides that no document required to be published shall be valid until filed and made available for public inspection. The Federal Register's contents "shall be judicially noticed."
> § 308 provides for constructive notice through the Federal Register.
> § 311(a) authorizes codification of the documents of each agency; (b) provides that "any codification . . . shall be printed and bound in permanent form"; (c) states that "cumulative supplements . . . may be published annually."

Important interpretative cases are cited in 44 U.S.C.A. and 5 U.S.C.A.

The Federal Register averages between 10 and 12 thousand pages a year. The Code of Federal Regulations consists of some 60 volumes, each provided with a pocket for the insertion of supplements. In an average year, some 20,000 pages of the Code are amended by the daily Federal Register entries.

These amendments are collated and cumulated in pocket supplements to the appropriate volumes. Volumes are normally revised or supplemented as of January 1 of each year. More frequent supplementation of a volume semi-annually, quarterly, or even monthly, has been authorized sometimes upon request of an agency.

Each regulatory proposition in the FR-CFR system has a distinctive section number. Daily, monthly, quarterly, and annual numerical lists are designed to enable the user to run down the amendments to a given section or group of sections.

General and permanent regulations appearing in the daily Federal Register are numerically keyed to the Code of Federal

Regulations. The Federal Register, in this respect, is intended to serve as a daily supplement to the Code of Federal Regulations.

The Federal Register and Code of Federal Regulations are available in about 425 depository libraries across the country. Many private firms and libraries subscribe to one or both. There are about 7,500 private subscribers to the Federal Register. An additional 7,500 copies are distributed daily, as required by law, to Congress, the courts, and the executive agencies. About 1,180 sets of the CFR are distributed for official use during a calendar year. In a normal calendar year about 65,000 CFR items (books and supplements) are purchased by the public.

A subscription to the daily Federal Register costs $15.00 per year, postage free. The current price of a set of the CFR is $281.25. A subscription to all CFR supplements and revised volumes costs an additional $66.50 for the current year. Individual books of CFR and the supplements vary considerably in price. One of the larger books might run as much as $7.75, whereas one of the smaller supplements may cost only 20 cents. Subscriptions or orders for individual copies are handled by the Superintendent of Documents, Government Printing Office, Washington 25, D. C.

C. Tabulation of Answers to Federal Register Committee Questionnaire

Questionnaires Mailed 2,093
Replies Received ..... 603 ..... As of 2/19/1960

1. Do you use the Federal Register? No 168 Yes 435
   Daily 222 Weekly 65 Monthly 61 Occasionally 87
2. Do you use the Federal Register to obtain:
   a. Notice of applications, proposed rule making and proposed orders ..... Yes 299
   b. Rules of practice of agencies ..... Yes 258
   c. Currently effective regulations ..... Yes 268
   d. Other ..... Yes 157
3. Do you use the Federal Register because of your interest in:

   One particular agency..... 152
   Two particular agencies... 35
   Three or more agencies... 216

   List of agencies in which interest was expressed—on next page.

4. Have you any suggestion for editorial improvement for the Federal Register? Representative samples of letters containing comments and suggestions follow in Appendix I
5. Do you use the Code of Federal Regulations? No 250 Yes 353
   Daily 40 Weekly 82 Monthly 103 Occasionally 128
6. Do you use prints or pamphlets supplied by the agency rather than the Code of Federal Regulations? Yes 310
   Why? ..... See Appendix II
7. Do you use a commercial service to obtain agency notices and regulations? Yes 274
   Why? .....See Appendix III
8. Have you any suggestion for editorial improvement for the Code of Federal Regulations?.....See Appendix IV
9. Would the Code of Federal Regulations be more useful to you if the portions relating to particular agencies were published in loose-leaf form, with daily or weekly supplements? Yes 349 No 254

APPENDIX I

Samples of Comments and Suggestions

(1)

I am returning to you the questionnaire for your Federal Register Committee.

When I was an attorney in the Department of Health, Education, and Welfare, I spent many hours wading through the Code of Federal Regulations. Then, as now, I felt that there was a crying need for editorial improvement. Such would be a monumental task, however.

In my private practice I rely to a large extent upon the private services.

I have not commented regarding editorial improvement other than to indicate that I am for it. I think this sort of thing should take a lot of study.

(2)

Anent the enclosed questionnaire: When the Federal Register was instituted, as I recall in the mid-thirties, I subscribed for the government publication reflecting all entries. I dropped the subscription after some months

because I could not keep up with it and attend to any other business.

In our former office, we used the Code of Federal Regulations but we do not have it now although obtaining it has often been considered. The chief reason we have done nothing about obtaining the full code is that our contact with governmental agencies has largely been with the Treasury Department. We have used several of the private services for that purpose. Nevertheless, I think that the code is of important value.

(3)

I think I have a complete file of the Federal Register from its inception to date. You appreciate this is a tremendous amount of material and if its contents were intelligently indexed it would be a very valuable source of information. My difficulty is that I find the indices practically worthless in attempting to pinpoint from an index any specific matter and generally the material has only two uses, viz: If you have a reference then, of course, you go find what you are looking for. Without a reference the material is for all practical purposes lost. The alternative is to make copies of the material one is likely to use and run your own index on it. This, of course, is time-consuming and not always satisfactory.

The only practical solution under current circumstances which I see would be to have someone skilled in indexing prepare and keep current an index covering all of the material that has been published in the Federal Register. This would be a stupendous and costly task, and, of course, everyone would not be satisfied with it.

Actually, except as I pick out material daily that is of interest to me this mass of paper is just that and not much more, and the most satisfactory procedure is to write to the agency involved and obtain what data is required. This, of course, involves a lot of wasted time.

These comments apply to the Code of Federal Regulations. They need to be tied together with a Digest which is kept current. The year books are not very satisfactory unless you know the year which is involved in your problem.

(4)

I return herewith questionnaire concerning the Federal Register, and Code of Federal Regulations. I formerly subscribed to the Federal Register, and used it almost daily. My most substantial interest was in practice before the Interstate Commerce Commission, Bureau of Motor Carriers. I also used the services of Commerce Clearing House, both Federal Carriers and State Carrier Guide. These services were more convenient with respect to rules, regulations and proposals in that area. Of course, they do not cover applications. I finally discontinued my subscription to the Federal Register.

While a large part of my practice is in the field of administrative law, the proportion involving state agencies has increased while that before federal agencies has decreased in recent years. Perhaps this is contrary to the general trend, but in any event, the sheer bulk of the material presented in the Federal Register made its use in my office increasingly inefficient. I would have sufficient interest in several other federal agencies to be interested in the Code of Federal Regulations in looseleaf form, as outlined in your last question.

Perhaps I should also add that I do receive a large quantity of material, prints, pamphlets and otherwise, from the Department of Labor, Bureau of Employment Security.

(5)

Enclosed find Federal Register Committee Questionnaire. We would subscribe to the Federal Register if all of the notices were segregated by agency so that the portions pertaining to the particular agencies we are interested in could be readily separated and stored. Completely re-doing the format of the Federal Register would undoubtedly widen its circulation and usefulness.

As attorney for this company I am interested primarily in those notices emanating from the Federal Home Loan Bank Board. It is simply too much work to read the Federal Register each day to pick up these occasional items. Possibly the Register could be published in sections by agencies, with subscriptions for the particular sections.

(6)

The Federal Register and Code of Federal Regulations are no more complex than the agency rules they codify. In three areas, however, both can be tremendously improved:

(1) Indexing should be more detailed and consistent. This might be accomplished by adopting a *uniform* scheme of subject headings.

(2) Supplements should be made permanent and understandable.

(3) Rules of each agency should be complete and should contain such matters as "statements of consideration" and prescribed forms.

My first comment about indexing is that it is expensive to do it well and unforgivable to do it poorly. The National Archives has apparently chosen the latter course. One feature of the Code of Federal Regulations which is incomprehensible to many of its users is that titles which are spread into several volumes have separate indexes for each volume but none for the complete title.

The proposal to publish the Code of Federal Regulations in loose-leaf form would be wise if we needed only the current rules. Most problems which reach the courts, and many which do not, require knowledge of the rules as they existed on a particular day and year. A loose-leaf service is not suitable for permanent records. Filing of superseded pages is an expensive, time-consuming task. There is opportunity for a vast number of human filing errors.

Whatever the reason for publishing "piggy back" supplements to certain of the Code of Federal Regulations pocket parts themselves the practice should be discontinued at once. The Code of Federal Regulations is a cumbersome enough compilation as it stands by virtue of the agency rules it codifies without throwing this additional roadblock in the path of its users.

The Director of the Federal Register Division of the National Archives and Records Service should be required to publish annual hard-cover supplements to the Code of Federal Regulations in addition to the pocket parts which he blithely recommends that we discard (51

Law Library Journal 379 (1958)). These permanent records were conscientiously published for many years and were discarded in favor of annual pocket parts when the 1949 edition of C.F.R. was published. Both are needed.

Many agencies prescribe their own forms. It would be a simple matter for the Federal Register and Code of Federal Regulations either to reproduce the forms in full or to list them by name and number. A public agency should make doing business with it as simple as possible.

(7)

I have your letter of December 14 concerning the Federal Register and the Code of Federal Regulations. Our office reads the Federal Register regularly for purposes of picking up notices, proposed orders, regulations, etc. We also use a commercial service to obtain notices and regulations.

Two of the lawyers in our office who read the Federal Register regularly have made the following comments with respect to the Federal Register which I believe deserve consideration by the Committee:

1. It seems to me that regulations issued pursuant to a section of the United States Code should be separately issued, separately bound and separately indexed along the lines of the U.S.C.A. index.

Less important matters—notices, reports, etc.—might be further subdivided and segregated. In any event, they should not be mixed with departmental and agency regulations.

2. F.R.: Text of regulations by agencies and departments, whether proposed or adopted, should be published separately, as are the IRS regulations, perhaps in a separate section of each issue.

All other items required to be published in the F.R. should be published in a separate section. This would facilitate the publication of the C.F.R. supplements as well, making it possible to keep them more current.

C.F.R.: Should consider dropping footnotes setting out text of statutes and use additional space to enlarge

print of text. References to pertinent statute should suffice, particularly if a new numerical system can be devised following U. S. Code sections.

(8)

Enclosed is questionnaire which I must hastily add, was prepared without knowing whether or not, the *FEDERAL REGISTER* is a set of books, a law appearing in the USCA, Title 44, Sections 301 et cet., and elsewhere. As a set of books, I have never even seen it. In fact, I have consulted with practically every attorney in this city and none of them had the faintest idea of what it contained. This also applies to the Code of Federal Regulations.

We have the U. S. C. A. here, but that, together with the Federal Reporter, Congressional Report, and Executive Orders, just about completes our works within the Bar Association here.

The answers which I have sent on the Questionnaire refer to the use of the USCA and other reports of Federal Courts and Administrative Agencies, under other names—not the *FEDERAL REGISTER.*

I would appreciate further information on this.

APPENDIX II

Samples of Comments and Suggestions in Reply to Query 6

Query 6:

Do you use prints or pamphlets supplied by the agency rather than the Code of Federal Regulations? No .... Yes .... If yes, why?

More than 75 of the affirmative answers, replying to the "why" part of Query 6, stated that convenience was at least one of the impelling reasons. *Samples of Suggestions and Comments:* (numbers are file numbers given the responses by the Committee)

14. We frequently use pamphlets supplied by the agency rather than the Code of Federal Regulations for the reason that many of these pamphlets contain the

regulations, etc., in a completely revised form, whereas, in the Code of Federal Regulations it is frequently necessary to refer to pocket parts for supplemental information.

35. More up to date—more current—they are more likely to be up to date and complete as of the time of receipt.

42. Are obtainable somewhat sooner.

44. CFR too far behind current developments.

47. I keep the prints in my office for ease in reference and because they are up to date. CFR with its annual supplement is not current.

62. Excessive number of supplements, etc., in CFR and uncertainty that average library has been able to keep it up to date.

71. The Internal Revenue Bulletins include new regulations, rulings, agency cases. Published weekly it is eminently readable, complete and reliable.

74. The code is frequently obsolete by the time it is printed.

81. The prints and pamphlets consume less space. Many of the subjects covered by CFR have little practical impact on our practice.

102. Because of time lag in CFR supplements.

150. More specialized.

186. Better indexed.

195. Easier to keep on hand and use, but for several agencies we keep the CFR volumes on hand rather than the complete set. Trouble is the infrequency of supplementation of CFR.

200. As specialist in some fields, I find it easier to use the same materials used by agency personnel.

213. Patent, trademark and copyright material of possible interest is such a tiny fraction of the material in FR that it is not worth combing through CFR or subscribing to CFR when the material is easily available in concentrated form elsewhere.

214. FCC is currently reissuing its rules and regulations in loose-leaf form. Where these are available, they are more convenient. Moreover part "O" of FCC rules are not in CFR, so must use agency pamphlet.

APPENDIX III

Samples of Comments and Suggestions in Reply to Query 7

Query 7:

Do you use a commercial service to obtain agency notices and regulations? No .... Yes ....
If yes, why?

Like those answering Query 6, there were many answering Query 7 who used commercial services for reasons of convenience. Many used commercial services because of "better indexing." Other reasons given, keyed to the answers, follow:

5. We subscribe to commercial service for general information also.

9. Covers my material better from my point of view.

15. Use it to double-check (several gave this answer).

20. More information and concise.

28. More thorough and informative.

31. For interpretative material.

33. The material is kept up to date in one convenient spot and is well indexed and cross-referenced.

34. Promptness of service and more recent information.

56. As to (1) taxes and (2) labor—prompt service, findable, good indexing—integration with other material.

66. Includes articles and case notes—annotations available.

71. Better indexed, accurately identified as to amendments of regulations; correlated with other pertinent materials.

88. Service prompt, accurate and satisfactory.

96. Use for other purposes also.

97. Has digest keyed to FCC rules.

118. Material kept up to date, easily available, well organized.

125. Because of current daily service for FCC releases.

127. More rapid service—as double-check to avoid missing anything—frequently integrated with relevant secondary discussion and commentary.

138. Need daily special service tailored to my own requirements.

162. Much more convenient and less time-consuming, as service is specialized and pinpointed.

191. Separates wheat from the chaff.

195. Actually we rely on these services vastly more than on the Register or on the CFR, for the reason they are current, indexed and regularly supplemented.

231. I would like to see a reporting service for petitions to review filed under § 15A of CFR 608c and subsequent sections. There is no such service now, and it would be very helpful to receive them.

245. FR too complex to locate any items—also incomplete.

250. Get twice daily service and full specialized information.

APPENDIX IV

Samples of Comments and Suggestions in Reply to Query 8

Query 8:

Have you any suggestion for editorial improvement for the Code of Federal Regulations? No .... Yes .... If yes, explain.

12. Better grouping and indexing.

14. The biggest improvement in the Code of Federal Regulations, from an editorial standpoint, would be to make the pocket parts more frequent and also to reprint, in the pocket parts, complete provisions amended rather than to show a sentence or a phrase which has been changed.

17. Uniform rule numbering system. Clean out obsolete rules annually. Annotate each rule into section of statute implemented.

18. Index—digest and supplement.

19. We think it is excellent. If expense would permit, it would help if pocket parts could be issued semi-annually instead of annually and if new volumes were issued before the pocket parts were so large.

22. Annotation of the case law under the specific regulations would save a lot of time.

25. By and large, does a good job.

30. Delete much of lengthy standard phraseology of opening paragraphs of orders, releases, etc.

33. An index for each title would increase its usefulness. It should be supplemented more regularly.

45. I wish the GPO could establish a subscription service for the separate volumes of the CFR and between publication dates of the pocket supplements send out the amendments to a particular volume in pamphlet form to subscribers, so that they would not have to wade through entire FR, when they are interested in only one agency.

46. More detailed index and cross-references.

51. No editorial improvement but always out of date.

53. Better indexing and frequent pocket parts.

54. The date of any change should be shown. In this manner the effective date of a regulation would be readily ascertainable without having to work back to prior editions.

55. More frequent addition from FR.

60. A more thorough index to each volume, perhaps by the agency itself.

61. For reference purposes, the past history of each rule and regulation should be noted.

62. More frequent complete re-editing, to cut down number of supplements, etc.

66. It is too expensive.

71. I have tried upon several occasions to locate current regulations in the Code. For some reason, I found the Code completely unusable in an area—(taxation) where I am fully conversant with the regulations generally.

74. Make loose-leaf and send replacement pages shortly after publication. The agency does this anyway to keep its own personnel up to date. By consolidation one printing can be made. (A one-agency attorney—Immigration and Naturalization.)

78. Why can't we get the pocket parts shortly after the first of the year while they are still current?

81. Abolish the Register. It is so bulky, it is seldom read. Each agency should be required to mail its proposed changes to all persons registered for practice before it.

86. Eliminate orders of limited applicability—or obviate them.

91. It would be a wonderful thing if regulations could be greatly reduced in length, but perhaps this is not "editorial."

IMPROVEMENTS OF THE FEDERAL REGISTER SYSTEM

By David C. Eberhart

Director of the Federal Register

May I first express my appreciation of this opportunity to further the work of the Committee on the Federal Register. Mr. Layne and Mr. Cox are to be commended on the way they have undertaken the Committee's work of digging up facts on which to base improvements of the Federal Register system.

The questionnaire sent to the Section members, together with the analysis of the returns, has already borne fruit. This Committee action has provided the Federal Register staff with new ammunition and new courage with which to assail the entrenched conservatism that often bars the road to substantial improvements.

It is fortunate that the establishment of this Commitee followed so closely the recent rejuvenation of the Federal Register program.

Last March [1] the Register staff obtained a fresh charter and new authority to start on a program designed to keep up with modern demands and advancing needs in this area. We felt pretty much out-numbered until reenforced by this Council's action last August—the action that established the Committee on the Federal Register.

I propose now to refresh your recollection of a few background facts; explain briefly the Federal Register's plans to improve the present system; invite your criticism of these plans; and earnestly invite your support of such features or added measures as may merit your approval.

Turning back about twenty-five years—to the time when I first started concerning myself about these matters—we find Federal quasi-legislation in the mess that Professor Griswold described as "Government in Ignorance of the Law." (48 Harvard Law Rev. (1934), p. 198)

The present order of things is incomparably superior to the chaos that prevailed before the Federal Register Act—when publicizing their rules was left up to each issuing agency.

[1] 1 CFR, Ch. I; 24 F.R. 2343.

I find it hard to believe that anyone seriously wants to return to those days of hip-pocket legislation and "Government in Ignorance of the Law."

To prevent such retrogression, it appears that there must be maintained a sound system of central recording—and permanently available publication—covering the documents contemplated by the Federal Register Act and sections 3 and 4 of the Administrative Procedure Act. That is the premise on which the present Federal Register system logically stands.

Your Chairman has spoken against emasculating the regulatory agencies in the process of eliminating isolated defects. Our premise is somewhat similar. It stands against burning down the library in order to obtain loose-leaf roast pig. Please do not misunderstand me. The Federal Register staff is enthusiastically in favor of loose-leaf service. We believe simply that it should be based on an effective, permanent system, adequate to meet official and judicial recordation, reference, and research requirements.

As presently constituted the Federal Register cannot aspire to compete with commercial services. Commercial services are free to include quasi-judicial materials, unofficial summaries, press releases, and agency or trade gossip; whereas the Federal Register must restrict itself to the literal text of official documents officially promulgated under law—documents whose validity depends on such publication.

Presumptively, this restriction is wise and is essential to the integrity and dependability of the Federal Register system. When you refer to text in the Federal Register or Code of Federal Regulations you know with legally presumed certainty that the words you are reading are the law and not merely someone's opinion or comment.

Without this certainty, and the dependent validity requirements, application of the principles of judicial notice and of constructive notice becomes impossible.

Without recourse to these principles, matters of proof become unbearably burdensome. Lack of certainty of the governing text inevitably would breed controversy. Proving notice and proving validity would also breed countless dilatory tactics. What then would happen to the dockets of both the agencies and the Courts? Perhaps our present situation would seem like Utopia in comparison.

Under the present system, when materials and services beyond

Univ. of Arizona Law Library

the scope of the Federal Register are needed, they are supplied by private enterprise or by the issuing agencies as a supplementary service.

In this connection, the Federal Register staff holds out a standing offer to assist entrepreneurs. The staff also holds out—and continuously plugs—an even better standing offer to assist the issuing agencies. We emphasize the availability of more frequent supplements to the Code, and we particularly emphasize the help we can give in establishing and maintaining current and economical loose-leaf services.

We offer to supply reproduction proofs of documents as they are set for printing in the daily Register. The agency can get these virtually "for free" on an overnight basis. These proofs can be photographically enlarged to any desired size of type and quickly printed by photo-offset together with such added material as the agency desires.

This is the system used by the General Services Administration in issuing its loose-leaf service covering the Federal Procurement Regulations.

Here are our general plans for immediate improvements in the Federal Register system. Many features are already in effect.

A. The Daily Federal Register

1. *Format.* (a) Reserve the front page and second page for the use of the daily index and daily codification guide.

(b) Start the text of each issue on the third page under the appropriate banner head—such as "Presidential Documents" or "Rules and Regulations."

(c) Start each major division of each issue on a new page under the appropriate banner head.

(d) As far as practicable, arrange the content of each major division in logical order, grouping together the non-codified issuances of a given agency.

(e) Maintain a consultant group devoted to the continuous improvement of typography and format—including the possibility of tear sheets supplementing the CFR.

2. *Indexes.* (a) Run the daily index on the front page with liberal use of boldface type and white space.

(b) Maintain a consultant group devoted to the simplification and continuous improvement of the monthly, quarterly, and annual indexes.

3. *Coverage and draftmanship.* Maintain an effective task force devoted to improving the coverage and style of documents required or authorized to be published.
4. *Speed.* Maintain the policy and practice of publishing documents on an overnight basis.
5. *Loose-leaf supplementation.* Maintain an effective task force devoted to developing loose-leaf services in each area in which such service appears desirable.

B. Code of Federal Regulations

1. *Format.* As books are revised, split them into smaller bindings based on use, rearranging the order of parts where necessary to such unit presentation.
2. *Supplementation.* Issue cumulative supplements annually, semi-annually, or quarterly, as required for effective use. Special situations may even justify *monthly* supplements.
3. *Speed.* Through use of photo-offset and simplified binding, reduce to a minimum the lag between the cut-off date and actual distribution of each revised book or cumulative supplement.
4. *Indexing.* Maintain a consultant group devoted to the simplification and continuous improvement of indexes to individual books, individual titles, and the General Index to the entire Code.

Please remember that these are only immediate plans, most of which are in the process of being carried out. Even so, they will meet most of the valid suggestions received, not only from the Committee's questionnaire, but from all other sources to date.

Of course, we also have long-range plans. These include complete, open-minded reevaluation of the whole Federal Register idea. Perhaps every fundamental on which the present system of promulgation is based is wrong, or wrongly implemented. Certainly the possibility of such basic error should be explored thoroughly and periodically. I am sure that the American Bar Association and this Section will contribute greatly to this long-range evaluation.

In the meantime, your continued assistance in perfecting immediate improvements is urgently needed.

As a starter, for example, the Federal Register needs to know:

(1) What units of the Code of Federal Regulations should be supplemented semi-annually, quarterly, or perhaps on a monthly basis?

(2) What units of the Code and what uncodified materials should be supplemented by loose-leaf service? What should each specific service include? How frequently should change sheets be issued? How much would practitioners be willing to pay for service on one Commission's issuances?

Perhaps *you* need to know whether criticism will be received at the Register in the right spirit and acted on in that spirit.

As far as outside help is concerned, the Federal Register staff has fought a lonely war on forlorn shores. We have suffered from public indifference—not criticism. We always have, and I'm sure we always will, more than welcome advice and correction. Like a neglected child, we appreciate attention, even if it means a spanking.

More seriously—each of us at the Register is fully aware that no one knows all the right answers to the proliferating questions in this field—least of all those of us who are engaged in the daily struggle to do the best we can with what we have.

HAVE ADMINISTRATIVE AGENCIES KEPT PACE WITH MODERN COURT-DEVELOPED TECHNIQUES AGAINST DELAY?— A JUDGE'S VIEW *

By Judge Irving R. Kaufman

United States District Court,
Southern District of New York

At a recent meeting of the Judges of the court in which I sit, we discussed the feasibility of having a full-time staff of special masters associated with the court to supervise the pre-trial preparations in the so-called "big" cases. We were fairly enthusiastic about this idea until we began to receive comments from attorneys and judges to the effect that we were dreamers if we thought we could get lawyers with sufficient stature, ability and experience to command the necessary respect of the litigants who would be willing to accept what would probably be a thankless and difficult task at a government salary. This jolted us for a while until someone thought of the hearing examiners. It was pointed out that somehow those alphabet agencies down in Washington were able to attract people as hearing examiners with all of the qualifications we thought essential—high competence, integrity, judicial temperament and a magnificent dedication to public service. Even apart from the renewed hope for our little project which this fact permitted us, it made us proud to remember that there are people with your selfless devotion to the well-being of this country.

Since the rewards for your services are certainly not lavish, you should at least be entitled to the satisfaction of knowing that you are performing an important task well, and that your work is appreciated. Unfortunately, you would be justified in feeling that even these gratifications of public service have been denied to you. The agencies and the administrative process have been subjected to such incessant and scathing attacks of late, that it wouldn't be surprising if you were not only demoralized but even somewhat shell shocked. Only the latter would account for your inviting an outsider to address you who might find the temptation to take another swipe or two at the administrative process irresistible.

* Address at the 12th Anniversary Dinner of the Federal Trial Examiner's Conference.

Unfortunately, the agencies have been an excellent target. Even the poorest marksmen, while perhaps not scoring any "bull's eyes," still find it hard to miss entirely.

While there has been enough truth in almost all of these charges to cause concern, it is necessary to be wary of the inevitable flood of "easy" solutions. The cure-a-headache by cutting-off-the-head people continue to advocate the elimination of all administrative agencies and the placing of their adjudicatory functions with the courts. Of course, on alternate days, some of these same people argue that since so many of the courts haven't yet been able to cope with the enormous volume of automobile accident cases, these cases should be taken from the courts and given to an administrative agency. But they tell me that consistency is the hobgoblin of small minds and these people are accustomed to thinking "big." Since they seldom get very specific, it isn't clear whether they contemplate the transfer of the hundreds of thousands of applications before the Veterans' Administration, the Social Security Board, or the Bureau of Old Age and Survivors' Insurance, three of the clearest cases of pure adjudication, to the courts. Heaven forbid!

Now, despite the temptation, I am going to try to avoid heaping more logs on the bonfire of attacks on the agencies and the administrative process. And, if this is some consolation to you, I would like to say that I don't see any elimination of the administrative agency phenomenon. While there may be some reshuffling and possibly the return of certain limited types of cases to the courts which were removed at a time when people were worried about the conservatism of the Court—a complaint which isn't heard too often these days—the trend unmistakably points to the further mushrooming of administrative agencies and their powers. The inevitability of this trend was recently illustrated when, at the peak of dissatisfaction with the agencies, while one congressional committee was exposing L'affaire Goldfine, another committee down the hall was preparing to establish a new administrative agency with broad discretionary powers to regulate explorations into outer space.

This illustration points up, I believe, the futility of searching for villains to explain the agency phenomenon. If there is any villain, it is our industrial civilization with its rapid and vast scientific discoveries and technologcal marvels. Virtually every major technological advancement has created problems which could not be solved by the traditional processes of legislative enact-

ment and judicial enforcement. Even where direct regulation of scientific developments, such as in the atomic energy, radio, television and airplane cases, is not essential, the problems resulting from the giant industries which have sprung up to furnish raw materials and to finance, manufacture and sell the products of technological advances, have required the establishment of such agencies as the Federal Power Commission, the Federal Trade Commission, the Securities and Exchange Commission, the National Labor Relations Board and many others. Consider the enormously complex ramifications of a scientific development as modest as the horseless carriage. Its heirs, to mention just a few, have included not only the enormous automobile, oil, rubber and steel industries, but also a vast network of traffic and highway regulations, state motor vehicle bureaus, licensing systems, traffic courts and federal control of interstate bus and truck operations through the ICC. All of these developments were inconceivable a century ago.

With the pace and complexity of scientific progress continuously accelerating, the problems which must be dealt with have vastly increased. Congress, fully cognizant of the dangers involved in granting broad discretionary powers with only slight control over their exercise, and equally cognizant of the operational failings of the agencies, has been reluctantly compelled, time after time, to place these problems in the hands of the agencies.

The predicament facing Congress is perhaps best illustrated by the treatment accorded the problems of atomic energy development. Without more than the most general guiding standards set forth in the law, Congress gave to the Atomic Energy Commission vast discretionary powers, broader than those given any other administrative agency in this country. In discussing this, one commentator noted:

> "There is indeed no escape from conferring such powers—from relying largely upon the wisdom of the men who are chosen for these important posts. It is simply not possible, at this stage of the atomic energy game, to write in careful detail the applicable rules of law. Congress knew what it was doing, but it simply could not do differently." Stason, Law and Atomic Energy, Annals of the American Academy of Political and Social Science 96 (1947).

It is time the critics of the administrative agencies disabused themselves of any notion that the agencies are a passing phenomenon. Not only are they here to stay, but if modern science

continues its irrepressible forward surge, and there is certainly no reason to expect otherwise, the agency institution is likely to play an ever greater role in our society. Any constructive effort to remedy the defects in the administrative process must begin with a realization of this fact.

The second step, it seems to me, is to concentrate less on the search for all encompassing panaceas, and more on improving the day-to-day mundane details of administrative procedures. While these matters are less exciting, catch fewer headlines and may even seem trivial, they determine not only whether the entire system will work but whether it will work justly. It took the courts a long time to shift their gaze from the absorbing substantive issues to the problems of providing a procedure which would make sense and give meaning to the abstract substantive rights. While the agencies are still in their infancy, they can't afford to be as long about it as the courts were.

Now I am certainly not in any position to propose definitive solutions to your procedural problems. It would be presumptuous of me to try. Not only are there basic differences between the courts and the agencies which may necessitate different solutions, but there are vast differences in function among the various agencies. Despite these differences, however, there are many problems common to both the courts and the agencies. And to the extent that our problems are similar, the efforts that have been made by the courts to solve them may suggest possible approaches that will be useful to you.

I would venture to say that the greatest procedural problem of both the courts and the agencies is definition of the issues to be tried. Absent such definition, trials will be unduly protracted and will not proceed in an orderly manner; records will be voluminous and will be cluttered with a good deal that is extraneous; and, most significant, the attention of the trier of the facts will not be focused on the real issues in dispute, so that he will be sorely taxed to arrive at a just and intelligent determination. Any hearing where the issues are not well defined is bound to be an inefficient hearing; it is also bound to be unnecessarily expensive and time-consuming for all involved.

Neither the courts nor the agencies can or should look to more stringent pleading requirements as the answer to this problem. Under your administrative procedures, as under our Federal

Rules, pleading requirements are extremely liberal. In the words of the Advisory Committee on the Federal Rules:

> "The intent and effect of the rules is to permit the claim to be stated in general terms; the rules are designed to discourage battles over mere form of statement and to sweep away the needless controversies which the code permitted that served either to delay trial on the merits or to prevent a party from having a trial because of mistakes in statement."

These words could be applied equally to pleadings in administrative litigation. Indeed, Professor Davis has commented that "[t]he most important characteristic of pleadings in the administrative process is their unimportance."

While the policy underlying general fact pleading is a most salutary one, the pleadings often shed little light on the real issues in dispute. In those proceedings which are initiated by a complaint and answer, for example, the allegations and denials are sometimes broad and vague. The agencies not infrequently set out their allegations in general form, perhaps in statutory terms, thus failing fully to apprise the respondents and to permit them adequately to prepare their defenses. Similarly, in proceedings which are begun by applications, the applicant is put to his proof on such broad issues as public interest, convenience and necessity, although, in fact, the ground upon which the agency doubts the propriety of a grant may be narrow.

In the face of such imprecise delineation of issues, the old "let them go to trial and everything will come out all right" theory of litigation is about as practical as inviting a group of people to participate in an athletic event without designating whether they will be playing baseball, football or ice hockey. The litigants are forced to wait until the contest is in progress before they can discover what game is being played. And if this is hard on the litigants—think of the referee.

The federal courts have sought a cure for these ills in the fields of liberalized discovery procedures, judicial control during the discovery phase, and pre-trial conferences. For many years, intensive study into the problems of streamlining and expediting litigation has been conducted by the federal judiciary through the agency of the National Pre-Trial Committee of the Judicial Conference of the United States, of which committee I have been a member. Particular attention has been focused upon the prob-

lems of the protracted case, and a special committee has been appointed to undertake a study of those problems.

Again and again the committee studying these problems has pointed to increased judicial control during the pre-trial stages as the sine qua non of efficient judicial administration. In particular, the pre-trial conference has been heralded as the greatest single weapon against delay and inefficiency in the litigation process.

Actual experience has more than vindicated these conclusions. In my own court in the Southern District of New York, for example, we have found in pre-trial the best answer to a seemingly insurmountable problem. Located in the greatest financial and industrial center in the world, complicated commercial litigation and important criminal cases naturally tend to gravitate to our district. We handle annually one-fifth of all copyright cases, one-fourth of all government civil anti-trust suits and one-fifth of all private anti-trust suits. In addition, New York being the largest port in the nation, 35% of the admiralty and maritime litigation in the federal courts is filed in the Southern District, as are more than one-half of all Jones Act suits involving injury to seamen. Because of this heavy caseload we found ourselves, a few years ago, facing serious calendar backlogs. Litigants were required to wait for as much as three-and-a-half years before their cases came up for trial. Then on October 3, 1955, we initiated sweeping calendar reforms which performed near miracles. In a relatively short period of time the deadwood had been cleared away and the calendar had been brought up to date.

But our battle did not end there. We soon learned that the likelihood of a speedy trial encourages new filings. Since 1955 there has been a 50% increase in annual new filings in our court. In the court year ending June 30, 1958, for example, the number of new cases filed per judge in the Southern District of New York was 374 as compared with the national average of 259. Thus, in order to fend off calendar backlogs our judges must each dispose of about 1½ times the number of cases yearly as the national average.

In view of this deluge of new business, you may wonder how we managed to keep from being swamped. The answer is that we are able to dispose of our cases far more expeditiously than ever before. And the pre-trial conference is the key to this new found success. All cases are exposed to at least one pre-trial conference

before our calendar judge, shortly after a note of issue has been filed. The conferences are usually very informal in nature, and are best suited to the needs of the simple case. Larger and more complex cases are subjected to more formal pre-trial and the extremely large, or so-called "big" case is assigned at the outset to a single judge who supervises discovery and usually conducts several pre-trial conferences.

It has been our experience that many cases dissolve under the bright light of the pre-trial conference. Not only does the frank atmosphere of give-and-take at the conference lead to many settlements, but oftentimes the issues of fact are stripped away, so that only questions of law remain, which may be resolved on a motion for summary judgment.

The achievements of the Southern District of New York do not constitute an isolated example, but are merely illustrative of the excellent results which are being achieved throughout the federal courts by the use of pre-trial techniques.

But what have the administrative agencies been doing during this era of great progress in the courts? I can only repeat the answer which one hearing examiner gave to that question:

> "The uncomfortable truth is that whereas the processes of the courts were being rapidly improved and expedited, the hearing processes of the agencies and departments of the federal government generally remained virtually at a standstill." Bond, The Use of Pre-Trial Techniques in Administrative Hearings, 73 F.C.C. Bar J., 55, 56-57 (1953).

This lack of progress hasn't been because pre-trial was unknown to the federal agencies. Virtually every agency has some form of pre-hearing conference rule. Nor has it been due to a lack of encouragement. As far back as 1941 the report of the Attorney General's Committee on Administrative Procedure stated:

> "[P]erhaps the most fruitful probabilities for expediting and simplifying formal administrative proceedings lies in the field of pre-hearing techniques."

Through the years this exhortation has been repeated by the President's Conference on Administrative Procedure, by the Hoover Commission and by a host of others who have studied the problems of administrative procedure.

Why then this failure fully to embrace a procedural weapon which holds out such promise? Are the hearing examiners so

foolish that they wish to travel through unknown lands while deliberately eschewing a road map?

The answer is that some few brave pioneers from among your ranks have ventured to experiment with pre-trials. And as with all pioneers they have not always found the going easy. Indeed, some of these pioneers suffered serious setbacks which disillusioned them with the pre-trial procedure. Because of these failures some hearing examiners have come to believe that the pre-trial conference is simply not applicable to the administrative process. I can say only that the courts, too, have had their disappointments with pre-trial. In my own court there was a time, not too many years ago, when pre-trial was abandoned completely in the run-of-the-mill cases. The belief that pre-trial was not workable in a district as busy as ours began to gain fairly wide acceptance. But there were some who felt that pre-trial—a more flexible pre-trial, tailored to the needs of the individual case—deserved another try. Experience has justified their faith.

When we reinstituted our pre-trial calendars many attorneys were heard to moan: "Oh no—not that again!" But these moans soon turned to chortles of joy as the attorneys realized that our new procedures helped them to dispose of more business than ever before and helped to clear the calendars for the cases which had to be tried. The reason that we succeeded where previously we had failed was flexibility. We had come to realize that pre-trials must not be conducted like the old trials by compurgation —according to an invariable rigid ritual. We hearkened to the words of Judge Murrah of the Tenth Circuit, Chairman of the National Pre-Trial Committee, who described pre-trial as

> "a common sense method of sifting the issues and reducing the delays and expense of trials so that a suit will go to trial only on questions as to which there is an honest dispute of fact or law."

Within the framework of these guiding principles, the pre-trial conference may assume varying forms, depending on the circumstances of the case and the forum.

What is important is that the attorneys get together with the judge sometime in advance of trial, and, in an atmosphere of free give and take, lay all of their cards on the table. The judge wants to know, and he wants both sides to know, just what is in contention and how it is expected to be proven—witnesses and all. Where this is done under the guiding hand of a conscientious,

competent judge, the end product will be an orderly, simplified trial.

To achieve this result in a large, complex case may require lengthy and frequent full-dress conferences in open court with a reporter taking down every word. On the other hand, the small, run-of-the-mill case may only require what Judge Medina likes to call a "pow wow," an informal talk in his chambers where we can visualize him saying to the lawyers:

> "O.K. Boys, let's cut out the nonsense and talk turkey. What's this case all about?"

The precise form of pre-trial conference best suited to your individual situation may not be readily apparent. But I can assure you that the efforts expended in searching for that optimum procedure will be richly rewarded.

They tell me that Thomas Edison achieved a successful dry-cell battery on his 500th try. When a friend remarked that it was a great shame that all that time had been lost on unsuccessful experiments, Edison replied:

> "Oh no, not at all. Now I know 499 ways *not* to make a dry-cell battery."

In our efforts to improve the administration of justice, we must adopt Mr. Edison's philosophy. Achievement does not thrust itself upon us. It is almost always the product of much work and some failure. But if we know that the solution to our problems can and must be found, then each failure only brings us closer to success.

I am firmly convinced that with a certain amount of tenacity and willingness to experiment, you will find the answers to the problems that have plagued your attempts at pre-trial. It is my firm conviction that the administrative agencies, as the courts, will find in the pre-trial conference their most important procedural weapon. I know that in many instances the pre-trial is time-consuming and difficult for the participants, but I know also that ultimately it will save time and expense and produce a more orderly hearing, and that these benefits will flow in a measure far in excess of the time and effort expended. I urge you to embrace pre-trial and to encourage it, and I assure you that, if you do, the time between complaint and decision will be narrowed and the hearing itself will be truly a search for the truth instead of a contest between combatants.

Now I believe that in some cases your disappointments with pre-trial may have been due to an inability to secure the necessary cooperation and advance preparation on the part of the litigants. Where this cooperation cannot be secured, the conference is doomed to failure.

Our experience with pre-trial has taught us that a successful conference requires hard work and diligence on the part of judge and lawyers just as much as does the trial itself. The pre-trial conference is not a job for errand boys or a young clerk fresh out of law school, as some lawyers seem to think; it is a job requiring the utmost skill and ingenuity of experienced counsel and experienced judges. Therefore, if you wish to obtain the rewards of pre-trial you must insist that the lawyers do a good deal of work in advance of the conference. Ideally, they will have had a preliminary conference among themselves. And I might note here that in protracted or complex cases I send the attorneys what I call an order governing pre-trial preparations, which, among other things, requires them to do some spade work and to meet with one another in advance of the pre-trial hearing.

My experience has taught me that you can and will secure the desired cooperation if you make it clear at the outset that you will accept nothing less.

A hearing examiner with the Federal Trade Commission recently summarized his experience with pre-trial in this manner:

> "I have found the pre-hearing conference very, very valuable in a lot of cases. The difficulty I have found, and I experienced this more when we first instituted the pre-hearing trial conference procedure, was that the respondent came in, having had experience with the pre-trial practice in the courts, prepared to lay his cards on the table and come to some definite conclusions.
>
> "Counsel in support of the complaint would come in and discuss the matter generally; you could get no frank statement out of him. And after the pre-trial conference he wanted to take the matter discussed back to his superior officer to find out what he could do.
>
> "Well, under circumstances like that, a pre-trial conference is futile." Cox, 11 Administrative Law Bull. 146 (Winter 1958).

I frequently encountered the identical problem in the beginning, but only once, I believe, with any one law firm. Occasionally a firm would send down a young associate without any real authority to discuss the case because they didn't want to waste the partner's time. When, during the course of a conference, it became

apparent that this was the case, I would have the associate call his partner and tell him that I wanted him to come to court immediately. When he arrived I would ask him why he felt he could waste the court's and his adversary's time. This always elicited a promise that it wouldn't happen again and to the best of my recollection it never did. Now the same thing would occasionally happen with the Government attorneys. I would tell them that if they didn't have authority to discuss the case openly and negotiate stipulations, I wanted them to have whoever had the authority in Washington to be in my chambers at the next scheduled conference. This usually resulted in a hurried call with the Assistant returning and saying that he now had the proper authorization. A similar situation sometimes developed where the lawyer would say that he agreed fully with a certain point but that his client refused to authorize it. I would then tell the lawyer to bring the client into court. I remember one instance where the lawyer represented a railroad and said that he would have to clear the matter with their claims department which in turn would have to clear it with the house counsel who in turn would have to clear it with someone else. I asked him if the President of the railroad would have the proper authority to give me a definitive answer. When he answered yes I told him to have the President in court at the next conference. Again there was a telephone call and again the lawyer returned with the proper authority.

After a few months of this, word spread around that the lawyers came to the conference properly prepared and with full authority. I don't see any reason why you shouldn't insist on the same both from the agency counsel and the respondent. Where the result of your not insisting is interminable delay, and a waste of your time, it is your obligation to do so. As another hearing examiner noted recently:

> "At the present schedule of pay rates, I can't say that our time is valuable, but it certainly is scarce, very scarce." Hier, Pre-Hearing Procedure at the Federal Trade Commission, 11 Administrative Law Bull. 140 (Winter 1958).

In addition to demanding preparation and cooperation on the part of the attorneys, the hearing officer must play an active role in the conduct of the conference. While he must at all costs avoid coercing stipulations, he should actively probe and analyze the case with the attorneys to determine what are the real issues in

dispute and what is surplusage. This will call for a high degree of skill on the part of the examiner. It is, in the words of Chief Judge Clark of the Second Circuit, "the perfection of the judicial art."

Where feasible, the names of witnesses, both factual and expert, should be exchanged at the conference. Often, during such an exchange, stipulations as to the witness' testimony can be obtained, thereby obviating the need and expense of calling the witness. Each side should be permitted to inspect the documentary evidence which the other side intends to offer. In this way needless technical objections may be eliminated and the need to call authenticating witnesses avoided and the hearing will not be delayed while documents are inspected prior to admission.

The end product of such a conference is a streamlined, orderly hearing at which the issues are sharply drawn, many extraneous procedural and evidentiary matters have been eliminated and the pattern of the hearing is clear to both the hearing officer and the litigants. Compare this to a matter which proceeds to a hearing without the benefit of a pre-hearing conference. The hearing officer is confronted with a vast array of testimony, documents, pleadings and technical arguments which is reminiscent of that famous definition of a law book: "chaos with an index." He may well sympathize with the English Justice, who after presiding over a protracted case for several weeks, leaned forward to ask the attorney: "Counsel, do you really think my life expectancy is sufficient to enable me to conclude this case?"

There is another reason why you may have had trouble with your pre-hearing conferences. I refer to the absence of any meaningful discovery procedures. How can you ask anyone to lay his cards on the table when he feels the cards haven't been dealt yet. He doesn't know what his defense is because he's not sure of what he's really accused. Your pre-hearing conferences are frequently the only available discovery procedure rather than, as is generally true in the Federal courts, the final discovery procedure. Not only must the usefulness of these conferences suffer, but much more important, the absence of discovery converts any normally lengthy hearing into an endless one.

In place of discovery procedures, there is substituted what one examiner referred to as the "gimmick" of "trial at intervals." Cox in *In the Matter of Gulf Oil Corp., F.T.C.* Docket No. 6689 (Order granting motion requesting disclosure). This procedural "gim-

mick" is the complete antithesis of the ideal trial as envisioned by the Federal Rules and virtually all state procedures. It is based on the proposition that at least one and frequently both parties will have little or no idea of what they expect to prove and how they expect to prove it when the hearings commence. "Trial at intervals" is predicated on the belief that surprise will be the rule rather than the exception. It would require a great deal of ingenuity to devise a system which would result in a greater waste of the time of the hearing examiner and the litigants. Where the hearing is interrupted for many months to permit the parties to assess the testimony thus far given and to prepare for cross-examination, it is necessary to devote a substantial part of the next session to refreshing everyone's recollection as to where they left off. Huge amounts of repetitive testimony are admitted and it is extremely difficult to rule on questions of relevancy. The stenographic records which are reviewed by the hearing examiner and ultimately by the Commission or Board are of such fantastic proportions that the private parties frequently doubt whether it is humanly possible for the agency to review it with any degree of care. While these proceedings frequently are brought to curb actions which are detrimental to the public interest, and one would therefore imagine that speed would be of the utmost importance, the ultimate decision is generally not made for many years.

I ask what is the crucial value in concealment which requires the sacrifice of all these other important "public interest" benefits? Davis, in his recent Administrative Law Treatise, states:

> "Probably no sound reason can be given for failure to extend to administrative adjudication the discovery procedures worked out for judicial proceedings." Davis, Administrative Law Treatise 589 (1958).

I have also been unable to find any sound explanation for this situation. The only explanation that I have seen is the old bugaboo rejected by the Federal Rules, that all litigants should be treated as though they were Al Capone; that they are not to be trusted with the names of adverse witnesses in advance because they will intimidate them and force them to withhold testimony or to perjure themselves. It is assumed that the criminal sanction is not enough to deter these litigants or their attorneys. Even if it were true that this danger is more than the remotest possibility,

although the absence of criminal prosecutions and the experience of the Justice Department in civil litigations against these same defendants suggests that it is no more than that, I would still think that the public value involved in the prompt disposition of the majority of cases and in having an above-board procedure, would far outweigh the value of concealment. When a hearing examiner who subscribes to the concealment philosophy admits that to accommodate this view he is forced to follow a procedure which is "both stupid and cumbersome," that is almost reason in itself for abandoning it. *Hier,* supra, p. 142.

The use of "stupid and cumbersome" procedures which result in inordinate delay, vast expense to both the Government and private parties and a huge record which renders sound and careful judgment virtually impossible, for the sake of avoiding some remote danger, illustrates the rigidities into which the administrative process has settled.

Lastly, your attempts at procedural advancements have been hampered by the absence of any agency to conduct continuing studies into this area and to operate as a clearinghouse for information. Improvement in techniques requires a constant exchange of ideas. Only in this way can each examiner build upon the experience of his fellows. Our procedural advances in the federal courts were in no small measure furthered by the fruitful work of the Administrative Office of the United States Courts. Virtually every group which has made a careful study of administrative procedure has recommended the creation of a similar agency to conduct a continuous study of administrative procedures in action. The time is long since overdue for these recommendations to be taken out of the discussion phase and brought into fruition.

Now, gentlemen, a few moments ago, I spoke of the differences between our respective functions. Certainly, those differences exist but they are as nothing compared to the similarities in our work. For in my trials and in your hearings we seek after the same elusive prize—the truth. We seek the truth when we try to determine which of several contenders for a precious license will best serve the community. And when we strive to set a rate that will be fair to all, we are again attempting to distil the truth from masses of argument and data.

Our professional kinship goes deeper than this because if we are good judges and good hearing examiners we seek to find the truth with the least possible delay and at the least possible expense to

the litigants. Frequently the hearing examiner like the judge holds the power to delay justice or to give it speedily. He holds the power to deny justice by permitting costs to pile up.

I must confess that in declaring that the hearing examiner holds the power to give justice speedily, I may have overstated my case. While advanced procedural techniques can work wonders, and are essential to the speedy and just disposition of the caseload, the ultimate disposal of the work is frequently delayed by the fact that there are simply too few hearing examiners. Serious study must be given to the need to increase the ranks of the hearing examiners in many of the agencies.

And, perhaps, even more important, consideration should be given to the creation of a position similar to that of law clerk to aid the harried examiners in their basic research. Such a post could perform the additional function of providing excellent experience for well qualified law school graduates, and may even prove a fertile training ground for future hearing examiners. The additional payroll expenditures necessary to effectuate these proposals will be modest when compared to savings in time and expense which they will bring about.

Above all, every effort of the members of the bar, the reviewing courts, and particularly the agencies themselves must be expended to increase the prestige of hearing examiners. They are conscientious men of high integrity, performing an extremely important function. Those who practice before them must never be permitted to lose sight of that fact. The willingness of attorneys to cooperate and to enter into stipulations before a judicial officer is often measured by the esteem in which they hold the position of that officer. Respect for the office of hearing examiner is thus a necessary climate for the germination of procedural advancement.

The battle to provide speedy justice in the administrative hearing, as in the courtroom, is a continuing one. Our warfare against the menace of delay must be all out. For delay is the most insidious of enemies; insidious and terribly dangerous because it can almost always be rationalized away. Some shadow of a right that may be lost through expedition, some fancied danger lurking in efficient disposition is enough to self-justify the granting of extensions, adjournments, continuances, rehearings, ad nauseum.

Gentlemen, the right to be heard promptly and have one's cause decided swiftly IS a substantive right—often it is the most important substantive right in the case and one attainable without sacri-

fice of other rights. If we fail to recognize it as such we also fail those who rely on us.

There was some excuse, feeble as it was, for the damn-the-expense and damn-the-time attitude on the part of judges. They were weighed down by libraries of precedents from other and more leisurely days. The spirit of *Jarndice* v. *Jarndice* was much upon them. But you hearing examiners should suffer from no such mental encumbrances. It would, indeed, be ludicrous if men entrusted with the stewardship of atomic energy, channels of communication and outer space, were to be guilty of 18th century thinking; ludicrous and tragic, because the welfare of tremendous numbers of people rest in your hands. It is you who supervise the awarding of the most valuable business rights that the nation can bestow on private citizens and upon you depends the success of the regulatory legislation that keeps us from falling into utter chaos.

If there is anything which symbolizes the disillusion of the proponents of the administrative agency it is the factors of delay, expense and volume of record. The agencies, it was proclaimed, would avoid the outmoded rigidities of the courts; they would do what it was believed the courts could never do—have flexible procedures which would afford speedy determinations. The courts took these criticisms to heart and they went and proved that they could meet the challenge of modern day litigation. The shoe is now on the other foot and we are all waiting to see whether the agencies can rise to the challenge.

If you fail us there is no acceptable alternative. If that should happen then we would know that the need for expeditious administration of our most important laws and the concepts of fair play implicit in a full hearing are irreconcilable. That would be a realization of catastrophic effect.

However, I believe that efficiency and an end of unnecessary delay can be achieved within the framework of the present system. I believe it can and will be done by you gentlemen. Not by radical procedures or elimination of agencies but by the utilization and adaptation of procedures already developed in the courts and in some of the agencies. It is a job only you can do and I am confident that you will do it because you must.

ENHANCING THE FUNCTIONS AND STATUS OF HEARING EXAMINERS

By Jesse E. Baskette

Largely as a result of the Administrative Procedure Act, in 1946, considerable improvement has been made in the independence, status, and pay of Hearing Examiners. It has been recognized that, if our administrative process is to endure, it is essential to secure and maintain a qualified corps of Hearing Examiners, to permit it to function in an independent manner, and to increase the status and pay of Hearing Examiners to a level commensurate with the responsibilities they perform.

Some persons take the view that Hearing Examiners are mere subordinate officials. The role played by Hearing Examiners is no more subordinate, however, than is the role of a trial judge in the judicial process.

The American Bar Association has submitted to Congress a proposed Federal Administrative Practice Act which, among other things, would provide for the establishment of an independent corps of Hearing Examiners. Until this is done, it is the task of the Committee on Hearing Examiners of the Section of Administrative Law to be vigilant in carrying out the directions of the House of Delegates to preserve the gains already made by the Administrative Procedure Act. It might be of interest to discuss some of the current activities of the Committee on Hearing Examiners and to indicate some of the tasks which are ahead.

A. Hearing Examiners and the Social Security Act of 1939

The immediate past Chairman of the Committee on Hearing Examiners, Mrs. Fanney M. Litvin, explained the nature of the hearings conducted under the Social Security Act in an article in the *Bulletin* in 1958. (Volume 10, pages 27-30) Suffice to say the Social Security Act provides a nationwide program for old age, disability, and survivors' insurance. Where claims for these types of insurance are administratively denied, the law requires hearings to be conducted and for an ultimate system of judicial review upon the basis of records made at these hearings.

Last fall, the Subcommittee on Administration of the Social Security Laws of the House Committee on Ways and Means held

a series of hearings which, among other things, considered the status and functions of the Hearing Examiners who conduct these proceedings. The Committee on Hearing Examiners of the Section worked with Chairman Kintner in the preparation of testimony, which was presented to the Subcommittee by Mr. Kintner on November 12, 1959. In this statement, he called attention to the danger that the gains made by the Administrative Procedure Act are not being preserved in the present administration of the Social Security Act. In the first place, he called the attention of the Subcommittee to the Association's opposition to the action of Congress in granting authority to the Secretary of Health, Education and Welfare to appoint Hearing Examiners without regard to Section 11 of the Administrative Procedure Act. By the Act of August 27, 1958, the Secretary was authorized to make temporary appointments to terminate not later than December 1, 1959. By the Act of August 14, 1959, the Congress granted the Secretary's request for a continuation of the temporary authority to appoint such Hearing Examiners until December 31, 1960. In the second place, Mr. Kintner called the attention of the Subcommittee to the concern felt by the American Bar Association over the degree of supervision evidently sought to be imposed upon Hearing Examiners engaged in deciding cases under Title II of the Social Security Act.

Since the conclusion of the hearings before the Subcommittee on Administration of the Social Security Laws last fall, the Committee on Hearing Examiners has received information from a number of the Hearing Examiners employed under this program to the effect that the Department of Health, Education and Welfare is taking a light view of the criticisms made of its procedures at the hearings; that, at least in some instances, the Department is taking retaliatory measures against those Hearing Examiners under this program who have cooperated with the Committee on Hearing Examiners and with the Subcommittee of the Congress in bringing to light some of the questionable practices which have been employed; and that the Department may again go before the Congress in an effort to extend beyond December 31, 1960, its authority to retain Hearing Examiners who have been appointed without regard to the requirements of Section 11.

Unquestionably, this entire situation needs watching. It is expected that, in a short while, a report of the Subcommittee of the Congress which conducted the hearings last fall will be made.

The Committee on Hearing Examiners is keeping abreast of the developments in this field and will be prepared to recommend to the Section appropriate action if the Department of Health, Education and Welfare again attempts to extend its authority to appoint Hearing Examiners without regard to the requirements of the Administrative Procedure Act, or if it becomes evident that the Department is interfering with the independence of the Hearing Examiners performing functions under this program.

B. Selective Certification of Hearing Examiners

Another matter which has occupied the attention of the Committee on Hearing Examiners for the last year and a half has been the selective certification system now widely employed in filling Hearing Examiner positions. On two occasions, once last year and again this year, the Committee, on behalf of the American Bar Association, has expressed its opposition to the employment of this system to the Honorable Jack Brooks, Chairman of the Government Activities Subcommittee of the Committee on Government Operations of the House of Representatives. Briefly described, the selective certification system is a system under which an agency enters into an agreement with the Civil Service Commission whereby new Hearing Examiners appointed to the agency must have special qualifications in addition to being on the general register of prospective Hearing Examiners maintained by the Commission. Generally, these special qualifications call for previous experience in handling activities under the jurisdiction of the particular agency. Thus, if an agency wants a new Hearing Examiner, it is not enough that the Hearing Examiner is qualified and on the general register, but he must also have the special experience covered by the agreement made between the agency and the Civil Service Commission.

According to the information in the files of the Committee on Hearing Examiners, the following agencies have entered into these special agreements with the Civil Service Commission: Federal Power Commission, United States Coast Guard, Federal Communications Commission, Interstate Commerce Commission, Civil Aeronautics Board, Bureau of Land Management of the Department of the Interior, Department of Agriculture, Securities and Exchange Commission, Federal Maritime Board, the Appeals Council (now the Office of Hearings and Appeals) of the Depart-

ment of Health, Education and Welfare for Puerto Rico, and the National Labor Relations Board. This information is derived from a letter dated March 23, 1959, to Congressman Brooks from the Chairman of the Civil Service Commission. In the same letter from the Commission to Congressman Brooks, it is stated as follows:

> ". . . no formal legal opinion or ruling has been rendered dealing with the Commission's authority to establish selective certification standards for Hearing Examiner positions. There is specific authority for this type of certification generally in the Civil Service Regulations which stems from our authority under the Civil Service Act. Traditionally, this authority has been used by the Commission to fill positions having specialized requirements within a more general occupational field. Since the Administrative Procedure Act merely places the filling of Hearing Examiners under the Civil Service Act, we know of no reason why this regulatory authority can not be applied to these positions."

Another problem growing out of the selective certification system involves the retention of Hearing Examiners who have been or are about to be dismissed as a result of a reduction in force in an agency. Since the selective certification agreements apply to all appointments of Hearing Examiner positions in the agencies involved, "riffed" Examiners who do not have the required specialized experience are unable to fill Hearing Examiner positions in those agencies despite the fact that they have had years of successful experience as Hearing Examiners and may be at the top of the general register.

The net effect of the selective certification system as applied to Hearing Examiners appears to make it generally possible for the agencies to limit the new appointments to those persons who have previously served with the agencies.

In stating the opposition of the Association to this system, the congressional committee mentioned above was told that the Association believes generally that the selective certification practices are inconsistent with the legislative mandate of Section 11 of the Administrative Procedure Act, which requires independent appointment and tenure of Hearing Examiners. It was pointed out to the congressional committee that this practice would be eliminated entirely by the passage of Titles I and II of the Federal Administrative Practice Act, under which there would be created an Office of Federal Administrative Practice and Hearing Exam-

iners would be taken from the jurisdiction of the Civil Service Commission and placed under the jurisdiction of the independent office. Pending passage of such legislation, in order to preserve the gains made by the adoption of the Administrative Procedure Act, the congressional committee was told that the Association opposes these general and special selective certification practices of the Civil Service Commission because they are contrary to the spirit and intendment of Section 11 of the Administrative Procedure Act.

C. Recommendation of Interstate Commerce Commission to Amend Section 17 of the Interstate Commerce Act

In the report of the Committee on Hearing Examiners to the midyear meeting of the Council of the Section of Administrative Law, attention was directed to a recommendation contained in the *73d Annual Report of the Interstate Commerce Commission* (fiscal year ending June 30, 1959). At pages 168 and 169 of this Report, it is recommended as follows:

> "We recommend that section 17 be amended to authorize the Commission to delegate to three-man employee boards the power to make decisions in cases in which a hearing has been held and which do not involve issues of general transportation importance, with right of appeal to an appellate division whose decision would be administratively final."

In explaining this recommendation, it is stated that "Under this recommended amendment, hearing officers would continue to conduct hearings and issue reports and recommended orders as under present procedure." It is obvious, of course, that this recommendation of the Interstate Commerce Commission relates, in part, to matters which appear to lie outside the scope of the Committee on Hearing Examiners of this Section. On the other hand, it may be that this legislation, if enacted, could indirectly affect the status and functions of Hearing Examiners in some way. For example, the interposition of "employee boards" between the Hearing Examiners of the Interstate Commerce Commission and the Commission, itself, might conceivably have a tendency to make it difficult for such Hearing Examiners to achieve classifications and salaries commensurate with the responsibilities which they actually perform.

D. S. 2849 (86TH CONGRESS, SECOND SESSION)

The Committee on Hearing Examiners has been very much concerned with those parts of S. 2849 (introduced on January 19, 1960 by Senator Dirksen for himself and Senators Wiley and Hruska, and referred to the Committee on the Judiciary) which appear to turn the clock backward, in so far as Hearing Examiners are concerned, to the pre-Administrative Procedure Act days. Examination of this measure reveals that the hearing functions would be vested in "Hearing Commissioners" appointed by the agencies and under the control of the agencies to a much larger extent than are the present Hearing Examiners who are appointed pursuant to Section 11 of the Administrative Procedure Act. S. 2849 is a bill of considerable complexity and importance and, in so far as it would represent a retreat in the improvement of the situation respecting Hearing Examiners, it must be viewed with serious concern.

E. THE PAY AND STATUS OF HEARING EXAMINERS

There are now approximately 430 Hearing Examiners in the Federal Government. The top grade at the present time is GS-15, carrying a maximum salary of $13,970. The largest number of Hearing Examiners is in the Department of Health, Education, and Welfare, the Interstate Commerce Commission, the National Labor Relations Board, the Civil Aeronautics Board, the Federal Communications Commission, the Coast Guard, the Federal Trade Commission, and the Bureau of Land Management of the Department of the Interior. Many other departments and agencies have anywhere from one to nine Hearing Examiners. Also, the records of the Civil Service Commission reveal that the loan of Hearing Examiners from one agency to another is not an infrequent occurrence. For a long time, the American Bar Association has urged that the classification of all Hearing Examiners be raised to GS-18. At its midwinter meeting in Chicago on February 19, 1957 (*82 Reports of ABA,* 402, 403-416) the following resolution was approved:

> WHEREAS, The American Bar Association on February 21, 1956, adopted a resolution advocating the "inclusion in S. 2628 of an amendment to Section 11 of the Administrative Procedure Act which would provide that Federal Hearing Examiners shall be compensated at Grade GS-18"; and

WHEREAS, H.R. 7619, companion bill to S. 2628 was enacted on July 31, 1956, as Public Law 854 (70 Stat. 736) but without including any increase in compensation for Hearing Examiner positions or related judicial positions below the level of agency members whose salaries were increased in the order of 30 per cent;

Now, Therefore, Be It Resolved, That the American Bar Association urges the enactment of legislation providing for an increase in Hearing Examiner positions to Grade GS-18 and to specify a compensation for the Judicial Officer of the Department of Agriculture at a rate of compensation equivalent to that of an Assistant Secretary of the Department of Agriculture, and that the Section of Administrative Law be authorized and directed to advance appropriate legislation for the above purposes.

Even prior to the resolution just mentioned, the House of Delegates, at its Chicago meeting on February 20-21, 1956, had enacted a resolution which, inter alia, provided that it was the opinion of the American Bar Association that Federal Hearing Examiners shall be compensated at Grade GS-18 (see *81 Reports of ABA,* 402).

Thus far, the Association and others interested in this endeavor have been unable to secure passage of legislation to raise the salaries and grades of Hearing Examiners. It is hoped that this situation may soon be corrected. A bill has recently been introduced (H.R. 10114, 86th Congress, Second Session) which would have the effect of raising the grade of Hearing Examiners of the Federal Trade Commission from GS-15 to GS-18 and of increasing from 15 to 20 the number of Hearing Examiner positions authorized for the Federal Trade Commission. The Committee on Hearing Examiners feels that the Association should support this measure before the Congress, taking the position that the Association believes that all Federal Hearing Examiners should be raised to GS-18 and that, accordingly, the Association approves this particular bill as a step toward that end. There is some indication that the Civil Service Commission, itself, may soon recommend legislation to the Congress to increase the grade classifications and salaries of Hearing Examiners. The Committee on Hearing Examiners is very mindful of the crucial importance of this whole subject and will continue to do everything possible to promote legislation which will provide Federal Hearing Examiners with status and pay commensurate with the duties which they perform.

F. National Labor Relations Board Proposals Respecting Trial Examiners

Quite recently, the attention of the Committee on Hearing Examiners has been directed to two proposals affecting the NLRB's trial examiners, which purportedly had been made by the General Counsel of that organization. Briefly, those proposals are as follows:

> (1) Give the General Counsel's Division of Operations coordinating authority with the Chief Trial Examiner in scheduling hearings in unfair labor practice cases.
>
> (2) Decentralize the examiners through establishment of eight centrally located offices throughout the country, including Washington, D.C., from which the examiners would function.

The Committee on Hearing Examiners is considering these proposals very closely. The first appears clearly to be inconsistent with those provisions of the Administrative Procedure Act under which the Congress has directly delegated to the Hearing Examiners authority to regulate the conduct of the hearings. Moreover, it would appear to violate rudimentary principles of fair play to place in the hands of the General Counsel authority to control the scheduling of cases since the General Counsel, himself, is a litigant before the Hearing Examiners in these situations.

Also, the proposal to decentralize Hearing Examiners is viewed with considerable alarm since it would appear to make it difficult for the rotation system contemplated by the Administrative Procedure Act to function, and would, in other respects, appear to tend to interfere with the truly independent functioning of these Hearing Examiners.

G. Conclusion

Every sign indicates that the legal profession must be constantly alert to resist any attempts to encroach upon the gains made by the Administrative Procedure Act in so far as Hearing Examiners are concerned. Many of these attempts are made under the guise of improving efficiency or under other motives, which, independently considered, might be worthy motives. It must not be forgotten, however, that Hearing Examiners fulfill one of the most important roles in the whole administrative process. It is they who preside at the hearings and who, by the manner of their performance, provide the public with a display and image of adminis-

trative justice in actual operation. It is they, too, who make the initial or recommended decisions. Unless they can be permitted to operate in a true spirit of independence and unless they are provided with a status and pay commensurate with their duties, the whole process of administrative justice will inevitably fail. Not the least of the considerations which should govern is the fact that the heads of agencies and the heads of departments come and go, but the corps of Federal Hearing Examiners—now consisting of some 430 persons—is a very permanent element of the administrative process. It is the Hearing Examiners, more than any others, who actually provide a continuity in the development of the administrative process.

LEGISLATIVE INTEREST IN ADMINISTRATIVE PROCEDURE DURING THE 86TH CONGRESS: SOME NOTES, QUOTES AND COMMENTS

By Charlotte P. Murphy

During the past two sessions of the United States Congress, legislative interest in Federal administrative agencies and their procedures has increased materially, though no significant laws have been passed. The publicity surrounding the Harris Subcommittee investigations during the 85th Congress served to create considerable public concern about the conduct of the decisional process in the Federal administrative agencies. Furthermore, the Bar, in general, and the American Bar Association, in particular, which have been proponents for a long time of measures to improve the procedures and practices of Federal regulatory agencies, have done their part to enhance congressional interest in the field.

The cornerstones of the American Bar Association's efforts are the Association's Code of Administrative Procedure (S. 1070) and the Administrative Practice Act (S. 600).

The ABA has also advocated supervision by Congress of the activities of the administrative agencies by means of permanent committees operating in this area. The creation by Congress of the Subcommittee on Adminisrative Practice and Procedure of the Senate Judiciary Committee has been one affirmative answer to the ABA's recommendations.

I. Work of the Carroll Subcommittee

This Subcommittee is under the Chairmanship of Sen. John A. Carroll (D., Colo.), and includes Sen. Everett M. Dirksen (R., Ill.), and Sen. Philip A. Hart (D., Mich.) as members. Judge Joseph M. McDonald of Denver is serving as Chief Counsel for this group, with Carlile Bolton-Smith as Associate Counsel and Cornelius B. Kennedy as Minority Counsel.

As authorized by S. Res. 61, 86th Cong., the Carroll Subcommittee is required to make a full and complete study of administrative practice and procedure in the Federal departments and agencies in regard to the exercise of rule making, licensing and adjudicatory functions, and also the effect of the Administrative Procedure Act on these functions.

A. *The July Hearings on the Proposed Code of Ethics*

The initial hearings by the Carroll Subcommittee July 21 to 23, 1959 focused principally on examination of the need for a Code of Ethics to govern Federal administrative agency proceedings, especially S. 2374, which had been introduced by Sen. Carroll on July 13.

Sen. Douglas' Views

Sen. Paul H. Douglas of Ill. included the following remarks during his testimony in behalf of S. 2374:

"Why is the prohibiting of ex parte communications so important? It seems to me that the answer is clear. First, the basic American sense of fair play demands when there is a controversy that both sides may have a chance to present their points of view. If an ex parte communication is made by one adversary, it is only fair that it be publicly disclosed to his opponent, so that the opponent can answer it. In the clash between two differing interpretations of the same situation, the administrative agency or quasi-judicial body will be better able to reach a fair, sound, and beneficient conclusion.

"Secondly, there appear to be some ex parte communications which are given more attention than others." (Transcript of Hearing, pp. 12, 13)

Sen. Douglas then went on to describe five ways in which favorable action following such communications may raise a presumption of undue influence—1) if a top official, who decided a question in favor of a private organization, resigns and is soon employed by that organization at a substantial increase in income; 2) if the deciding official has received substantial gifts from a benefited party; 3) if a private communication is received from a host who has given unusually lavish entertainment to the official; 4) if the communication comes from a former boss of the agency official; 5) if the private communication comes from a business associate of the government official.

Sen. Douglas characterized S. 2374 as a step in the right direction, but was inclined to feel that it does not go far enough. He also noted with approval that the bill would apply to all persons, including members of Congress and those in the President's Office.

He concluded that:

"There are some who say we don't need more rules. All we need is a higher standard of individual ethics. This is a common plea.

Of course, there is no substitute for individual standards of ethics, no substitute for individual devotion to religious beliefs, but a great many people go wrong because they are not quite certain what the rules are, and because it is hard to turn down an individual who is merely falling in with the prevailing practice.

"Laws help make it easier for the average person to be ethical, because he can then plead the law as an excuse for doing the right thing. Frequently in public life you have to have an excuse to do the right thing. This is a sad comment on the life of our times, but you tend to be regarded as prissy if you hold rigid standards and people do not like to be regarded as prissy and self-righteous." (Transcript p. 23)

Department of Justice View

Robert A. Bicks, Acting Assistant Attorney General of the Antitrust Division, gave the Department of Justice view, reiterating the Department's stand in the *Channel Ten* case that, "The maintenance of proper standards by administrative agencies in the performance of their quasi-judicial functions is of the highest importance. . . . If these multiplying agencies are to serve the purpose for which they are created and endowed with vast powers, they must accredit themselves by acting in accordance with the cherished judicial tradition embodying the basic concepts of fair play."

Mr. Bicks urged that "the need for fairness in any agency proceeding cannot turn on whether the label 'rulemaking' or 'adjudication' be applied. What is important is the substance of the proceeding and the nature of the interests involved. Where a particular proceeding, regardless of its label, inevitably affects particular interests in a concrete, substantial way, fairness requires resolution of issues on the basis of full, open presentation by interested parties."

Mr. Bicks advocated that any applicant before an administrative body who seeks improperly to influence such agency decision in a quasi-judicial proceeding should be disqualified. "The fact that the Federal agency proceeding may involve the public interest, rather than private rights alone, makes such qualifications all the more imperative," according to Mr. Bicks, for "any applicant that seeks favored treatment through *ex parte* pleas to Commissioners must be unmistakenly told that the doors of the agency are closed to him." (Transcript pp. 32-38)

ABA Witnesses

The lead-off witness for the American Bar Association at the July 1959 hearing was the current President of the Association, John D. Randall of Cedar Rapids, Iowa. Mr. Randall noted that the recent Dawson Subcommittee questionnaire revealed 102 Federal administrative tribunals operating in the adjudications area, with or without statutory authority, in 10 executive departments and 21 independent agencies. He further stated that:

"In all this varied agency litigation, there is one common denominator, namely, the citizen's right to a hearing, and one of the fundamental incidents of this right is that the agency's decision in the hearing shall be confined exclusively to the evidence, pleadings, and papers of public record in the proceeding. We feel that the most humble citizen is entitled to the same right of hearing as the most influential. . . .

"These rights are destroyed to the extent that agency hearings are to any degree influenced by pressures and *ex parte* representation. So long as any agency environment is open to the suspicion that influence or pressure may be resorted to by litigants, public confidence in agency proceedings is impaired. . . .

"Legislation on this subject is difficult because the agencies have been granted mixed functions, executive, legislative and judicial. . . . S. 2374 is intended to apply only to those agency proceedings which are judicial or adversary in character. We do not believe that the ex parte prohibition should apply to merely administrative activities of an agency or to those activities which are purely legislative in character and form. . . ." (Transcript pp. 48-55)

John B. Gage of Kansas City, Mo., as Chairman of the Administrative Law Section, pointed out that:

"No one desires to hamper the sound efficiency of any Federal agency. The Administrative Law Section works in the direction of increasing that efficiency, expediting their proceedings, and at the same time ensuring as far as possible their fairness." Fairness requires notice, opportunity to be heard, and decision making on the public record, be stressed.

The Dirksen-Beelar Exchange

Sen. Dirksen interjected certain pointed questions and comments during the testimony of Donald C. Beelar of Washington, D. C. Sen. Dirksen said:

"Ever since 1933, since I came here as a freshman Congressman, I have been calling every agency in Government in the interest of my constituents and I expect I am going to continue to do it whether this becomes law or not, and I am afraid this is not going to become law with my sanction. . . ."

Sen. Dirksen then posed a hypothetical case in which two airlines (one based in Illinois) wanted to be certified by the CAB for stops in Iowa. While the case is pending and noticed for hearing,

". . . I call up and inquire and I say a kind word about my constituents in Illinois. . . . The fact that I have a momentary political title doesn't divest me of my character and habiliment as a person, as defined by the law. I have called up—'communicated.' . . . I wasn't authorized to do so, so there is no exception to apply to me. I didn't call up the other side and tell them I was going to do it. . . . Now, it says 'if it is a willful violation.' . . . Why, just out of the goodness of my heart I did it. I did it deliberately and with full intent. That makes it willful." (Transcript pp. 107, 108)

Then ensued the following exchange between the Senator from Illinois and Mr. Beelar:

"*Sen. Dirksen.* You tell me where it is wrong."

"*Mr. Beelar.* . . . Let me say, I have the same problem as you described. I have occasion to inquire, day in and day out, what the status of proceedings is, but I don't have to go to the trial examiner who is conducting the hearing in that case to ascertain that information."

"*Sen. Dirksen.* I went way beyond the trial examiner, I didn't even bother with him, he is just an intermediary. I went where the decision is to be made. The Commissioner I talked to would have a vote. If it is a five-man commission and I get three votes for my constituent, everything is hunkydory. So I went right to the point where the decision is made."

"*Mr. Beelar.* . . . Our bill is intended to protect the integrity of proceedings. We are not aiming at any type or class of individual, but we think the integrity of the proceeding can be protected only if it is protected totally. Now, we are quite aware of the important responsibilities of Congress, we are quite aware that they are the elected representatives who speak authoritatively for the public interest."

"*Sen. Dirksen.* That isn't what this says."

"*Mr. Beelar.* . . . This is a matter which Congress itself should consider, to what extent should the member of Congress intercede in court-like proceedings of individual persons. . . ."

"*Sen. Dirksen.* Let's take the television (proceeding) . . ."

"*Mr. Beelar.* The statute of the Congress makes an issue in every case the character of the applicant. If a member of Congress calls up the Chairman of the agency and says 'I just want to know the status of the case, and by the way, this applicant is a good friend of mine and a man of the highest character in my state,' his character may be very much at issue in this proceeding. So you see, if you want to testify as to his character, it would be best to do it on the record. . . ."

"*Sen. Dirksen.* . . . We will now take another specific. . . . Here is Town 'A' and there are three applicants for a TV channel. I know every one of them. They are my friends. They vote for me. Some of them may be a little closer than others. . . . (I)t is an adversary proceeding when that application is pending down there, because all three want this right.

"So it stays on the record for quite a while and then the first situation arises; an attorney comes to see me. He is representing Group '2'. They are one of the applicants. He says, 'Look, we want that television station. Call them up down there. You've got friends down there, haven't you? Call them up and see whether you can't do us some good. Make some inquiry, get some hint of how soon it is going to be decided, how the thing is to be disposed of. Get as much information as you can.'

"Mind you, that is the attorney for the applicant saying that. Why, for 26 years my office has been full of attorneys, who come with missions just like that. Now, you see, I can plead the Fifth Amendment, say I am sorry, I just can't answer your question, I can't make any comment.

"He will probably say—'Well, what kind of a friend are you, anyway? Don't you look after your constituents?' So what am I going to say to him? Or am I going to lift the receiver and see what information I get?

"Two weeks later, the chief applicant of Group 'Y' comes down, not the attorney, but one who is a part of the group that made the application. 'Look, we have got this application pending down there. Call up Joe Doak and ask him about it. Tell him you are interested.'

"Do I call him up or do I say 'I am sorry, but we just passed an

Act up there in Congress, it has got a section in it, Section 5, I got to read to you.' He will say, 'Oh, you don't have to read me anything. Are you representing the people in Illinois; are you going to call up down there? I don't know those fellows, I don't even know where the office is. All we want is a little service.' . . .

"Now, here you have two situations; first, the attorney came, a friend of mine. He says, 'Look, I want you to do this.' They have been doing it for 26 years. If I had ever kept a list it would look like Martindale's Directory, I think.

". . . These are hard situations and these go on every day. I got a half dozen calls over there in my office I've got to make after a while to some agencies. If this is on the books I have to dust it off and say, 'Wait a minute, any exceptions here? Can I do this or does the law say I may go to jail?'

"But they are my people, they sent me down here. And they can't find their way around in Washington. The Federal Register is so enormous now that the records on administrative decisions would fill this room.

"That is a baffling, bewildering thing for the people to confront. So what could they do? They do the natural thing—'I will call up my Senator, I will tell him about it.' . . ." (Transcript pp. 108-113)

Sen. Carroll Joins in the Discussion

"*Sen. Carroll.* . . . The other side of the coin, it seems to me, in the remarks of the distinguished Senator from Illinois, is this: If Chicago can move in with its Senator, why can't Missouri move in with its Senator? And then you don't have really a decision on the merits, but you find out how many Senators you can get on each side of the fence or how many Congressmen or how much influence you have got to the White House or the Executive Branch. . . . Members of Congress or the Executive Branch, have no right to call a Commissioner to influence his judgment in an adversary proceeding, in my opinion.

"Now, I understand that there are pressures—they come on me from home, too—in airlines cases. I know a little bit about airlines cases and I have been in politics a little while and I know many of these industries work both sides of the fence with political contributions. . . . [T]hey have forces working here all the time. This is what creates the problem. And there are tremendous pressures upon the commissioners and upon their staffs. . . .

"Basically, this is a moral question, an ethical question, and I feel very strongly that members of Congress should not interfere in adversary proceedings." (Transcript pp. 117-118)

"Mr. Beelar. The lawyers that I know, the colleagues that practice in these fields, would prefer that they try the cases and decide them on the record, because if the decision is motivated by ex parte influence, then it no longer is a legal decision. It becomes some other kind of decision.

"The lawyer doesn't like this. Sooner or later this reflects upon the profession. . . . I wanted to tell the Senator that in my experience the lawyers who are my colleagues are not seeking to run to the Hill in these adversary proceedings. In fact, in some of the notorious proceedings that have been referred to in the House, the lawyers appearing before the agency . . . had no knowledge of the back-door maneuvering. . . . The public protection demands that the citizen have a fair hearing and he can't have a fair hearing unless it is decided on the record.

". . . We feel . . . that fundamental to a fair hearing is the requirement that the decision be made on the record, because these records go up to the courts and when you go to the court, you want the record made (which reflects the) motivation in arriving at the decision, not a record which says one thing knowing that the decision was based upon other considerations." (Transcript pp. 119-123)

"Sen. Hart. Mr. Chairman, if I may clarify, . . . I think (Mr. Beelar) explained to Sen. Dirksen that inquiry was not, in his view, prohibited by this proposed legislation. You can find out the status of that TV application without talking to the Chairman of the Commission. . . ."

"Mr. Beelar. Very correctly."

"Sen. Hart. To which the Senator from Illinois said he did not care about the clerk, he wanted to talk to the Chairman."

"Mr. Beelar. . . . Our own thinking is that inquiry as to status is not an attempt to influence. Now it is pretty hard to draw (the line) once you go beyond and seek to have something expedited, this may be very prejudicial to the other side. But we have the same problem on the outside, of finding out what the status of the proceedings is, what is involved, and to be able to understand them. We are fully sympathetic and appreciate that members of Congress have the right to know what these agencies are doing."

"Sen. Hart. But you take the position that if you want to testify

with respect to the character of an applicant that you had better do that on the record?"

"*Mr. Beelar.* That is evidence . . . that the other side should be confronted with and have a right to cross-examine about."

"*Sen. Dirksen.* Now, Mr. Beelar, just look at the practical aspects of the matter: Here is a Commission, one of the members of the Commission comes from Illinois, let us say; what would be the natural thing to do? Call up the clerk? Why certainly not. You would call up the person in the Commission that you know in order to get information. That is the most natural thing in the world. I might not know the clerk. I might not know the chairman, but I know this fellow. I may know the hearing examiner, I may know a member on the staff. Well, searching my mind, let me see, who do I call? Well, with two and a third million people diffused through this government, you start looking through the books. Of course, after you have been on the ground here a long time you grow up with people. You go to a cocktail party, you see a member of the commission, you may see him two or three times, you may see him a dozen times. I suppose some of them I have seen a hundred times in 25 years. . . . You know him by his first name. You know something about his family. . . .

"The other day I called up the Interstate Commerce Commission. I thought, 'Wait a minute: Who do I know down there?' Suddenly I remembered a fellow who used to be up here on the Hill. I know him very well. I said I will call him up and make inquiry and find out. . . ."

"*Sen. Hart.* I am worried about the Chicago Diversion case in front of the Supreme Court and I hope there is no Illinois Supreme Court Justice on that bench. . . ."

"*Sen. Dirksen.* I am just putting this in a practical frame. . . . So you . . . can call the secretary of the Commission and say: 'What is the status of (the case)? She may be a charming young lady, . . . but just knows of me by name. And she may give you a casual answer and maybe you do not want quite a casual answer." (Pp. 129-132)

Congressional Insulation Needed

"*Sen. Carroll.* If we could pass such a statute as this, then we could say, 'I am sorry, gentlemen, I cannot violate the law and I am sure you would not ask me to do it?' . . . And if we have this, it would give protection to the members of Congress, to the

Executive Branch, and to the Commissioners themselves, because they could say, as one said (recently when) a certain Senator called him, 'I will be happy to do it for you, Senator, if you will change the law. I cannot do it today.' . . ."

". . . There has been too much of it even on the part of members of Congress and it ought to stop in adversary proceedings, whether we pass this or not, because the public opinion is mounting on this issue. . . ."

"*Mr. Beelar.* I do not believe this bill prohibits members of Congress inquiring about a case of an agency member. But I think if they get very much further beyond the identification, I think the agency member could very well say 'I am sorry, (but) that is a pending case before us and I cannot discuss it with you. I will refer you to so and so, or have so and so call you and give you the full information about it.' And people who are not involved in the decision of the case could very well . . . give members of Congress, lawyers, litigants, information about the status of this case, what the issues are and who is involved and what have you. . . ." (Pp. 133-137)

B. *Discussion on the Senate Floor*

On July 23, Sen. Dirksen spoke on the Senate floor and enlarged his hearing comments on S. 2374, with three other Senators joining in the discussion (105 Cong. Rec. 12881-12884, July 23, 1959):

"*Mr. Dirksen.* . . . Mr. President, some persons may think we live in a vacuum here in Washington, D. C. But there is not a vacuum, and we are made of flesh and blood. If a constituent from Illinois comes to Washington and asks for information, I am not going to plead the fifth amendment and say 'I have no comment.' That is what it amounts to when a Member of Congress talks to his constituents and does not try to ascertain the information they seek.

"Mr. President, that is the first implication of this issue. The reason for my talking about it today is to forestall this kind of legislation, which will be on the floor of the Senate later and when many questions may be asked and no answers will be forthcoming. I could not get an answer from the witnesses as to whether in a matter before the Interstate Commerce Commission I would come under the purview of Section 5 of the bill in an adversary proceeding, if no one urged me to make the call, but I picked up the telephone on my own volition and made an inquiry. It was stated

there were no exceptions. I would be subject to fine and imprisonment. If that is the score, I want to know about it, and I want to know about it now.

"Then, Mr. President, I have something to say to the American Bar Association, because there have been many lawyers in my office during these many years and there have been many members of bar associations. I, too, am a member of a flock of bar associations. I want to know what circumscription there might be of me in my representative capacity."

"Mr. Magnuson. And the lawyers get paid for their services."

"Mr. Dirksen. The Senator from Washington is so right. . . .

". . . A man would not be worthy of his salt in this body or in any other body if he could not talk to the legitimate representatives of various interests, have them lay their cases before him as persuasively as they can, and still preserve his independence in dealing with any matter involved.

"If we arrogate that kind of attribute to ourselves, then why should we not say as much for those who sit on regulatory benches and adjudicate adversary proceedings day after day? I see them around. I go to parties, as anybody else does. . . . I might see the commissioner of this agency or of that agency at some party. Probably at times I have asked, at these social functions, about certain cases. I might say, 'You have this matter over in your shop. What is its present status?' Is there anything so heinous or horrendous about that? It is the most natural thing in the world, but that does not mean the administrator caves in under any suggestion I may make. If he did, he should not be in the position he occupies today. . . ."

Sen. Mansfield of Montana, Sen. Talmadge of Georgia, and Sen. Magnuson of Washington then commended Sen. Dirksen for his comments.

The following day, the Chairman of the Subcommittee addressed his fellow Senators (105 Cong. Rec. 12957-12961, July 24, 1959):

"Mr. Carroll. . . . When I read the remarks made yesterday by the Senator from Illinois and the stated purpose of them, I could not believe that he was attempting to pull the rug out from under the subcommittee before it got started.

"The purpose of the hearing is to take evidence. The American Bar Association has been engaging in careful research on this matter for months, and they have testified this week.

"Yesterday, we heard from the Attorney General. He has given us a very comprehensive brief.

"We are not talking about little issues in connection with which Senators must, from time to time, go to the Veterans' Bureau or the Department of Agriculture. Certainly Senators are entitled to represent their constituencies.

"However, in this case I am talking about adversary proceedings, which in law are identical with court hearings. I do not really believe that the Senator from Montana understands the difference between the two. . . ."

"Mr. Mansfield. I am not a lawyer; but I have great respect for the Senator from Colorado, who is a lawyer and is a man of great reputation.

"I am glad he is making it clear that the duties and responsibilities which Members of Congress have assumed during all their years of service in either this or the other body are legitimate, provided Senators or Members of the House go through the front door and lay everything on the table for everyone to see."

"Mr. Carroll. That is correct. When I explained the situation this morning to the distinguished Senator from Washington (Mr. Magnuson) who is chairman of a powerful committee, he said, 'Of course, I agree with you.' But that was not the impression he left yesterday. I do not want members of my party or any Members of Congress led down a blind alley, and have the impression left that they are always doing something undercover for constituents, when there has been no such charge made against Members of Congress. We know of only one or two cases which have arisen and they have been in the executive branch. Why put the onus on the Congress, which has no such burden to carry?

". . . We have just begun hearings, and I do not want a committee which has been newly created torpedoed before it hears the evidence. Members of Congress are very jealous of their prerogatives of power. I do not want them to come before the committee and say, 'You are trying to cut down our power and say we cannot go to an agency.' The bill we are considering will only cut down the power of those who move through the back door, where they should not be in the first place. . . ."

Sen. Aiken of Vermont supported earlier remarks of Sen. Mansfield, commenting that:

"So long as I am in Congress, I am going to do all I can to help our people back home straighten out matters which they are

unable to do by themselves. I frequently call agencies of the Government. I do not care if they record what I say, because I never say anything I am not willing to make public. I do not tell them what decision to make. I merely ask that the agency may bring a certain case from the bottom of the pack to the top and go to work on it.

"Our people may be excused if they regard this so-called ethical drive which seems to be underway as an effort to force people back home to hire lawyers. I get a lot of inquiries from local attorneys. I suppose some of them charge their clients for what I do for them and more of them do not. But when it comes to the question of forcing everybody back home who has a matter in Washington to hire a Washington law firm or any other law firm to communicate with agencies of Government for them or be shown around, and to pay out a lot of money for this representation, I shall fight such a proposal to the best of my ability. . . ."

The hearing testimony and the Senate comments attest eloquently to the difficult and pressing problem of *ex parte* communications in adversary administrative proceedings.

C. *The November hearing of the Carroll Subcommittee*

The agency point of view was aired during the November 1959 hearing sessions. The following witnesses appeared: John C. Doerfer, Chairman, Federal Communications Commission; Charles W. Bucy, Assistant General Counsel for Marketing and Regulatory Laws, Department of Agriculture; Edward N. Gadsby, Chairman, Securities and Exchange Commission; George W. Abbott, Solicitor, Department of the Interior; James R. Durfee, Chairman, Civil Aeronautics Board; Jerome K. Kuykendall, Chairman, Federal Power Commission; Earl W. Kintner, Chairman, Federal Trade Commission; Kenneth H. Tuggle, Chairman, Interstate Commerce Commission.

These agency spokesmen were of the opinion that *ex parte* communications are undesirable and should not occur, but felt that the problem should not be solved by overall legislation, such as S. 2374. Rather, the general view was that the problem could better be solved by legislation geared to the special needs and functions of each agency.

It was agreed that administrators could gain from insulation against *ex parte* approaches in contested cases. However, it was

felt that inclusion of rule making under such a prohibition could prove troublesome.

In this connection, Mr. Kintner stated that use of the term rule making in S. 2374 is not sufficiently explanatory of the intended coverage and needs some definition. Mr. Kintner was also of the view that legislation like S. 2374 would serve to limit flexibility in the operation of individual agencies and, since flexibility is the chief asset of the administrative process, this could be a deterrent to the operation of the agencies.

The agency representatives conceded that they welcomed independent review of their procedures by law professors and other knowledgeable lawyers. Still, they harbored serious reservations that anyone who did not have day-to-day experience in dealing with agency affairs could properly judge the need for legislative reform, particularly in relation to the rule-making area.

D. *Views About the Office of Administrative Procedure*

The Carroll Subcommittee hearings also dealt briefly with Title I of S. 600, which proposes an independent Office of Administrative Procedure. In view of the spirited and lengthy exchange of views on the Code of Ethics bill, this proposal was somewhat dwarfed during the hearings.

Ashley Sellers of Washington, D. C., former Chairman of the ABA's Special Committee on Legal Services and Procedure, testified that "The American Bar Association does not feel that this office should be placed in any of the existing Departments and Agencies of Government, such as, for example, the Department of Justice. In view of the nature of the duties to be given to this office, the Association feels that it should be an independent agency."

Mr. Sellers then summarized the duties to be performed by the proposed Office of Administrative Procedure:

"Basically, these duties are to carry on continuous studies and to make continuous recommendations for the improvement of Federal administrative procedures. Further, these duties would require the office to act as a central depository of information for the public, the Congress and the other agencies as to the procedural aspects of administrative practice and procedure, and it would be charged with the long-range duty of bringing about clarity, understanding, and uniformity in these practices and pro-

cedures. . . . In collaboration with the agencies, the office could effectively stimulate uniformity in practices and procedure and in public information practices." (P. 236)

Still on the agenda of the Carroll Subcommittee for consideration are the ABA Code of Administrative Procedure (S. 1070), with agency comments due shortly; Senator Dirksen's Federal Code of Administrative Procedure (S. 2849); and Titles II, III, and IV of the Administrative Practices Act (S. 600).

Proposals for a Conflict of Interest Act (S. 3080—Javits, Keating, Proxmire; H.R. 10575—Lindsay) have also been referred to both Judiciary Committees. These bills crystallize the recommendations of a Special Committee of the Association of the Bar of the City of New York, for restrictions against conflicts of interest by employees of the executive branch of government, with criminal penalties provided in case of violations. 106 Cong. Rec. 2889-2902 (Feb. 23, 1960).

II. House Committee Activities

On the House side, there has not been comparable progress toward the goal of a permanent group concerned solely with the study of procedural problems of the administrative agencies. The House Government Operations Committee has done considerable work of this type, but its permanent role is not clear.

H. Rept. 2711, 85th Cong., by the Legislative Oversight Subcommittee, House Interstate and Foreign Commerce Committee, entitled the "Independent Regulatory Agencies," is an interesting document tracing the history, activities, and initial recommendations of this Subcommittee. Since some of the more bizarre aspects of the Subcommittee's work received considerable notice in the public press, this report served to put these accounts in perspective.

Also of interest is the recently issued Interim Report of the House Subcommittee on Legislative Oversight (H. Rept. 1258, 86th Cong., Feb. 9, 1960). While this report springs primarily from the Subcommittee's quiz scandal investigation, it contains certain observations and recommendations of general interest to the administrative practitioner.

For example, the Report noted that Congress has delegated broad powers to both FCC and FTC in the hope that:

> ". . . expert administrators, working within the confines of such standards and in intimate daily contact with the problems en-

> trusted to them, would be alert and imaginative in meeting the ever-novel and perplexing difficulties arising from time to time. The subcommittee's hearings on television quiz programs suggest that these hopes have fallen short of accomplishment. Thus, further weight is added to the doubts of those who question not only the capacity of the agencies to function effectively in the public interest but the very foundations of the administrative process itself.

The Subcommittee proposed a series of amendments to the Communications Act of 1934, "to bring an end to existing abuses in the use of airwaves and to provide greater assurance that they will be used in the public interest."

Despite the noble ring to these words, there is considerable controversy over the concrete proposals, and immediate action by Congress is unlikely.

NOTICE

Earl W. Kintner, Chairman of the Section of Administrative Law, has named the following as members of the Nominating Committee:

Mrs. Fanney N. Litvin
2800 Quebec Street, N. W.
Washington 8, D. C.

Richard S. Doyle
Transportation Building
Washington 6, D. C.

Charles E. Long, Jr.
Records Building
Dallas 2, Texas

He has designated Mrs. Litvin as Chairman of the Committee.

The By-laws provide that the Nominating Committee shall make and report one nomination for each position which is to be filled by election at the Annual Meeting. The Committee must submit its report to the Chairman of the Section in time to be published in the Administrative Law Bulletin, or otherwise, prior to the Annual Meeting.

In order that the Nominating Committee may have the benefit of suggestions of the membership of the Section, it is urged that recommendations for nominees be forwarded promptly to the members of the Committee.

ELIZABETH C. SMITH, *Secretary*

DIRECTORY OF MEMBERS OF THE ADMINISTRATIVE LAW SECTION 1960

ALABAMA

Armbrecht, W. H., P. O. Box 290, Mobile.
Ashley, Lawrence P., 508 Stallings Bldg., Birmingham 3.
Black, Hugo L., Jr., 1329 Brown Marx Bldg., Birmingham 3.
Crowe, Rae M., P. O. Box 290, Mobile.
Gillon, John W., 804 1st National Building, Birmingham 3.
Johnston, Jos. F., 1st Natl. Bldg., Birmingham 3.
McGraw, William D., 2923 Central Ave., Birmingham.
McHenry, H. D., P. O. Box 2563, Birmingham.
Moore, James E., Van Antwerp Bldg., Mobile.
Stoudenmire, S. F., Jr., P. O. Box 1689, Mobile.
Vann, David J., 2100 Comer Bldg., Birmingham, 3.

ALASKA

Rudd, Joseph, 204 Glover Bldg., Anchorage.

ARIZONA

Beer, Frank W., 710 Luhrs Tower, Phoenix.
Bentley, Burton M., 411 N. Central Ave., Rm. 521, Phoenix.
Brophy, Frank C., Jr., 519 Title & Trust Bldg., Phoenix.
Brown, Jack E., c/o Hon. C. C. Bernstein, Supreme Court of Ariz., Phoenix.
Daniels, H. B., 108 Capitol Bldg., Phoenix.
Davis, Laurence A., 2214 N. Central Ave., Rm. 213, Phoenix.
Mack, Wiliam D., 8201 E. McDowell Road, Scottsdale.
May, Robert A., 706 Ariz. Land Title Bg., Tucson.
McAlister, Charles B., 328 Security Bldg., Phoenix.
McGuire, John A., Box 1131, Yuma.
Merchant, Henry R., Jr., 45 W. Pennington, Rm 402, Tucson.
Mills, Larry E., 501 S. 3rd Ave., Phoenix.
Ong, Wing Foon, 1617 E. Thomas Rd., Phoenix.
Ralston, Joseph P., 519 Title & Tr. Bldg., Phoenix.
Thompson, Byron G., 910 Vly Nat. Bk. Bldg., Tucson.
Twitty, Howard A., 414 Title & Tr. Bldg., Phoenix.
Wilmer, Mark, 400 Security Bldg., Phoenix.
Winter, James D., 60002 Alabama St., Ft. Huachuca.
Woods, Charles H., 3921 La Creciente, Tucson.
Wright, Charles M., 3301 E. Seneca St., Tucson.

ARKANSAS

Faust, Mrs. Lois Morgan, Justice Bldg., Little Rock.
Harper, Thomas, Kelley Bldg., Fort Smith.
Henne, Fred E., 1501 Schaer, N. Little Rock.
Lasley, P. A., Pyramid Bldg., Little Rock.
McClellan, James H., Union Life Bldg., Little Rock.
Scharlau, Charles F., Jr., Ark Western Gas Co., Fayetteville.
Tarlowski, Louis, 601 Rector Bldg., Little Rock.
Wade, Clifton, 20 E. Center St., Fayetteville.

CALIFORNIA

Aaron, David, 5600 Grand Ave., Buena Park.
Aidlin, Joseph W., 3460 Wilshire Blvd., Rm. 615, Los Angeles 5.
Allen, John T., 600 Federal Bldg., Los Angeles 12.
Anderson, W. N., 3460 Wilshire Blvd., Los Angeles 5.
Austin, Irving P., 3907 N. Atlantic Ave., Long Beach 7.
Baird, Charles R., P. O. Box 727, Vista.
Baker, Frank W., 1043 10th Ave., Sacramento 18.
Bennett, Eugene D., Standard Oil Bldg., San Francisco.
Bennion, Donald C., 408 Channing Ave., Palo Alto.
Berry, Miss Virginia A., U. of San Francisco, Business Adm., San Francisco 17.
Boli, Louis A., III, 214 Forum Bldg., Sacramento 14.
Brodie, Joseph F., 49 Fourth St., San Francisco 3.
Brown, Albert J., 225 Bush St., San Francisco 4.
Calfee, Tsar N., 5701 Barrett Ave., El Cerrito.
Callaway, Hulen C., 639 S. Spring St., Rm. 600, Los Angeles 14.
Campbell, Hon. John C., P. O. Box 252, Little Rock.
Chamie, Alfred P., 8480 Beverly Blvd., Los Angeles 48.
Chuman, Frank F., 257 S. Spring St., Los Angeles 12.
Clark, Herbert W., 1110 Crocker Bldg., San Francisco 4.
Clarkson, John G., 1020 N. St., Sacramento.
Compagno, Vincent I., 111 Sutter St., San Francisco 4.
Compton, Edward L., 1232 Rowan Bldg., Los Angeles.
Cornell, Milton A., Jr., 412 W. Sixth St., Los Angeles 14.
Cotter, Thomas, P. O. Box 162, Eureka.
Cox, Hudson B., 1100 Roosevelt Bldg., Los Angeles 17.

CALIFORNIA—Cont'd

Creede, Frank J., P. O. Box 452, Carmel.
Crosby, Carlisle C., 1421 Central Bldg., Oakland 12.
Davis, Preston W., 1201 W. Olympic Blvd., Los Angeles 15.
De Grazia, Edward, 2151 S. 1st St., P. O. Box 254, San Jose.
Dickey, Randal F., Jr., Odd Fellows Bldg., Alameda.
Dinkelspiel, Martin J., 405 Montgomery St., San Francisco 4.
Doyle, David Francis, 25 Longview Court, Hillsborough.
Drummond, Forrest S., 301 W. 1st St., Los Angeles 12.
Drummond, Ralph M., 650 S. Grand Ave., Los Angeles 17.
Dyer, Noel J., 225 Bush St., San Francisco 4.
Edmonds, Douglas L., 523 W. 6th St., Los Angeles 14.
Ellis, Howard C., 85 Post St., San Francisco 4.
Evans, Albert G., 111 Sutter St., Rm. 418, San Francisco 4.
Fabris, Alvin J., 100 Bush St., San Francisco 4.
Fick, Winston M., 695 Colorado Ave., Claremont.
Fitzpatrick, Richard, 1218 C. C. Chapman Bldg., Los Angeles 14.
Fourt, John E., Dep. Atty Gen., Sacramento.
Funke, Eimo George, Library & Courts Bldg., Asst. Attorney General, Sacramento 14.
Gerdes, Robert H., 245 Market St., San Francisco 6.
Gilbert, Robert W., 8907 Wilshire Blvd., Rm. 201, Beverly Hills.
Ginsburg, Roland E., 3325 Wilshire Blvd., Los Angeles 5.
Gordon, Louis Alexander, 448 S. Hill St., Los Angeles 13.
Graham, Leland O., 2525 Fifth Ave., Sacramento 18.
Gregory, John M., 535A State Bldg., San Francisco 2.
Griffin, Ray E., 453 S. Spring St., Los Angeles.
Groezinger, Theodore, 450 McAllister St., San Francisco 2.
Gwynn, Edward R., 2700 W. Olive Ave., Burbank.
Handler, Marvin, 625 Market St., Rm. 1312, San Francisco 5.
Hansen, Gerald B., 512 Bank of America Bldg., San Jose 1.
Harris, Major L. A., 1421 Atherton St., Sacramento 22.
Hayden, Richard F. C., 900 Wilshire Blvd., Rm. 930, Los Angeles 17.
Henke, Dan., U. of Calif. Law Library, Berkeley 4.
Herlihy, E. Herbert, 412 W. 6th St., Los Angeles 14.
Hill, Gerald N. 155 Montgomery St., San Francisco 4.
Hillings, Hon. Patrick J., 315 W. 9th St., Los Angeles 15.
Holbrook, W. Sumner, Jr., 740 Rowan Bldg., Los Angeles 13.
Hong, You Chung, 445 Ginling Way, Los Angeles 12.
Hopwood, John Aldine, 707 Malabar Drive, Corona Del Mar.

CALIFORNIA—Cont'd

Howell, H. Rodger, 401 W. Eighth St., Santa Ana.
Huard, Leo Albert, 2960 Miles Drive, Santa Clara.
Hurwitz, Samuel, 100 W. Chapman, Orange.
Hutchinson, J. Albert, 55 New Montgomery, San Francisco 5.
James, Leonard G., 310 Sansome St., San Francisco 4.
Jewell, Stanley, 205 E. Carrillo, Santa Barbara.
Johnson, Gardiner, 111 Sutter St., San Francisco 4.
Julien, R. E. H., 220 Bush St., Rm. 1814, San Francisco 4.
Kaitz, Walter, 2572 Jacobs St., Hayward.
Kaplan, Sidney M., 756 S. Broadway, Los Angeles 14.
Karma, Arthur, 40 City Hall, Los Angeles 12.
Kaye, Merwin Whitcomb, Leg Coun. USOM, Korea, APO 301, San Fran.
Keatinge, Richard Harte, 3325 Wilshire Blvd., Los Angeles 5.
Kelly, Joseph P., Jr., 3440 Wilshire Blvd., Los Angeles 5.
Kidder, Marshall E., 448 S. Hill St., Los Angeles 13.
Kleps, Ralph N., Rm. 3021 State Capitol, Sacramento 14.
Lawson, Gordon, 811 W. 7th St., Los Angeles 17.
Lerten, Erwin, 610 S. Broadway, Los Angeles 14.
Lewis, Marvin E., Penthouse DeYoung Bldg., San Francisco 4.
Liipfert, Eugene T., 175 Linfield Drive, Menlo Park.
Lippitt, Henry F., II, P. O. Box 3249, Los Angeles 54.
Lomen, Miss Lucile, 1972 Meridian Rd., San Jose.
Lowry, Walker W., 1500 Balfour Bldg., San Francisco 4.
Marx, Herman, 630 Sansome St., Rm. 206, San Francisco 11.
Mather, Allen F., Box 2706 Terminal Annex, Los Angeles 54.
Mathews, Everett A., 333 Montgomery St., San Francisco 4.
May, Donald O., P. O. Box 292, Santa Cruz.
McDonald, John E., P. O. Box 1566, Santa Rosa.
McKeage, Hon. Everett C., State Bldg., San Francisco.
McKenna, William F., 139 N. Broadway, Los Angeles.
McManus, Hugh E., 542 S. Broadway, Los Angeles 13.
Mitchell, James H., 333 Roosevelt Bldg., Los Angeles 17.
Moore, Chas. V., P. O. Box 339, Eureka.
Mull, Archibald M., Jr., 515 Crocr Anglo Bldg., Sacramento 14.
Neary, J. Stuart, 634 S. Spring St., Los Angeles 14.
Netterville, Victor S., U. of S. Calif., Law Scl., Los Angeles 7.
Neusom, Thomas G., 1111 E. Vernon, Los Angeles 11.

CALIFORNIA—Cont'd

Newman, Frank C., U. C. Law Bldg., Berkeley 4.
Newman, Philip M., 354 S. Spring St., Los Angeles 13.
Nilsson, George W., 510 W. 6th St., Rm. 623, Los Angeles 14.
Ogren, Quentin Oscar, 411 W. Fifth St., Los Angeles 13.
O'Hara, Russell F., 525 Capitol St., Vallejo.
Packer, Herbert L., Stanford Law School, Stanford.
Pasquinelli, Louis, 1694 The Alameda, San Jose 26.
Pettit, Walter F., 405 Montgomery St., San Francisco 4.
Petty, Don E., 523 W. 6th St., Rm. 737, Los Angeles 14.
Pfrommer, Frederick G., 114 Sansome St., San Francisco 4.
Pickering, Harold G., 198 McAllister St., San Francisco 2.
Porter, Jesse Bach, 705 N. Broadway, Los Angeles 12.
Ransom, Edward D., 311 California St., San Francisco 4.
Rendler, Eugene Lloyd, 1233 McKendrie St., San Jose, 26.
Reeves, Albert L., Jr., 100 Bush St., San Francisco 4.
Renwick, Edward C., 422 W. 6th St., Los Angeles 14.
Reynolds, William L., 336 N. Foothill Rd., Beverly Hills.
Richards, W. Del., 1126 Central Bldg., Oakland.
Richter, George R., Jr., 458 S. Spring St., Los Angeles 13.
Riegle, Roy W., Jr., 827 Lapham St., El Segundo.
Rosendahl, Edwin M., 4262 Wilshire Blvd., Rm. 300, Los Angeles 5.
Rosenthal, Allen M., 408 S. Spring St., Los Angeles 13.
Rowland, Gilford G., 537 Forum Bldg., Sacramento 14.
Russell, Theodore W., 639 S. Spring St., Los Angeles 14.
Sargent, George L., 2533 E. 56th St., Huntington Park.
Scarborough, James G., 416 W. 8th St., Rm. 1320, Los Angeles 14.
Scully, Charles P., David Hewes Bldg., San Francisco 3.
Sharpe, Robert H., 1315 K Street, Sacramento 14.
Sherwin, William A., 541 S. Spring St., Los Angeles.
Shipman, Benjamin W., 523 W. Sixth St., Los Angeles 14.
Skelly, Albert F., 1306 Mills Bldg., San Francisco 4.
Slaughter, Warren E., 250 E. Palm Canyon, Palm Springs.
Spillane, Lester W., 405 Central Tower Bldg., San Francisco 3.
Stewart, Samuel B., 300 Montgomery St., San Francisco 4.
Stickney, Herbert H., 611 Warner Ave., Los Angeles 24.
Sweeney, Ralph D., 433 S. Spring St., Los Angeles 13.

CALIFORNIA—Cont'd

Sweet, Evan H., 1021 Van Nuys Bldg., Los Angeles 14.
Turner, Dewey E., 320 N. Main St., Fort Bragg.
Turner, William Edward, 3322 Studebaker Rd., 1A, Long Beach 8.
Waiss, Fredrik S., 20 Bush St., San Francisco 4.
Wallace, John H., 333 Montgomery St., San Francisco 4.
Welsch, Don A., 210 S. Firest St., San Jose.
Widoff, Josef, 257 S. Spring St., Los Angeles 12.
Wile, Philip H., 10th Floor, Helm Bldg., Fresno 21.
Wisecarver, R. P., 315 Montgomery St., San Francisco 4.
Witteman, Matthew H., 121 E. 6th St., Los Angeles 14.
Woodruff, Charles D., 1760 El Cerrito Place, Hollywood 28.
Wright Loyd, 111 W. 7th St., Los Angeles 14.
Yeamans, Richard K., 5658 Wilshire Blvd., Rm. 203, Los Angeles 36.

COLORADO

Beise, Charles J. 1536 1st Natl Bank Bldg., Denver 2.
Brenman, Albert, 610 American Nat. Bk. Bldg Denver 2.
Conrace, Joseph E. C., P. O. Box 1572, Denver 1.
Diss, William T., 1930 Sherman St., Denver 3.
Gregory, Arthur C., 1515 1st National Bk Bldg., Denver 2.
Harris, Louis Alexander, 818 17th St., Rm. 1210, Denver 2.
Henry, Hubert D., Majestic Bldg., Denver 2.
Kirgis, Frederic L., 222 Equitable Bldg., Denver 2.
Nelson, William A., 781 Ursula, Aurora.
O'Rourke, Dennis, P. O. Box 1052, Colorado Springs.
Porter, Ernest P., Box 5482 Terminal Annex, Denver 17.
Vigil, Charles S., 711 Ernest & Cranmer Bldg., Denver 2.
Weber, George H., 2480 W. 70th Ave., Denver.
Young, John C., Jr., 457 Independence Bldg., Colorado Springs.

CONNECTICUT

Bailey, John M., 434 Main St., Hartford 3.
Burns, Robert P., P. O. Box 486, Torrington.
Collins, John Laurence, 50 State St., Hartford.
Greenspun, Alexander, 880 Main St., Bridgeport 3.
Jainsen, Wilson C., 690 Asylum Ave., Hartford 1.
Kinsella, James Hall, 386 Fairfield Ave., Hartford 6.
McNamara, Joseph P., P. O. Box 72, Stepney Depot.
Murtha, John S., 97 Elm St., Hartford 14.
Parsells, Norman King, 886 Main St., Bridgeport 3.

CONNECTICUT—Cont'd

Randall, Warren S., 25 Lewis St., Hartford 3.
Reed, Robert G., P. O. Box 32, Newton.
Shea, Jeremiah D., 185 Church St. New Haven.
Smith, Olcott D., 750 Main St., Hartford 3.
Tiffany, George O., 401 Ridgeway Center, Stamford.
Tormey, Ronald G., 721 Main St., Hartford 3.
Weinstein, Arthur D., 49 Pearl St., Hartford 3.

DELAWARE

Breckheimer, Robert A., DuPont Bldg., Wilmington 98.
Horton, Roger R., Atlas Powder Co., Wilmington.
Johnson, John R. L., Jr., Hercules Powder Co., Wilmington 99.
Roth, William V. Jr., Del Trust Bldg., Wilmington.
Stokes, Edwin M., 1300 Market St., Wilmington 99.

DISTRICT OF COLUMBIA

Adams, Joseph P., 242 Wyatt Bldg., Washington 5.
Ailes, Stephen, Shoreham Bldg., Washington 5.
Akerman, Alex., Jr., National Press Bldg., Washington.
Albertson, Fred W., Munsey Bldg., Washington 4.
Alexander, Charles J., 1824 Jefferson Place, Washington 6.
Alk, Isadore G., 820 Woodward Bldg., Washington 5.
Allen, Nicholas E., 1001 15th St., N. W., Washington 5.
Alper, Jerome M., 425 13th St., N. W., Washington 4.
Anderson, Howard C., Jr., 725 13th St., N. W., Washington 5.
Anello, Douglas A., 1771 N Street N. W., Washington.
Angland, Stephen J., 3415 38th St., N. W., Washington 16.
Ash, Robert, 1921 Eye St., N. W., Washington 6.
Axman, Laurence H., 3636 16th St., N. W., Washington 10.
Austern, H. Thomas, 701 Union Trust Bldg., Washington 5.
Avery, Mrs. E. Austin, 3122 Legation St., N. W., Washington 15.
Babcock, Harry Allan, Fed. Trade Commission, Washington 25.
Babson, Frederick A., Jr., 2001 Mass. Ave., N. W., Washington 6.
Badger, Paul L., 1000 Conn Ave., N. W., Rm. 1208, Washington 6.
Barash, Max, 710 Sheraton Bldg., Washington 5.
Barker, Robert W., 744 Jackson Pl., N. W., Washington 6.
Barnard, Robert C., 224 Southern Bldg., Washington 5.
Barnes, John P., 930 H St., N. W., Washington 1.
Barnes, Maurice R., 543 Munsey Bldg., Washington 4.
Baron, Theodore, 752 National Press Bldg., Washington 4.

DISTRICT OF COLUMBIA—Cont'd

Barus, David Nickerson, 1625 K St., N. W., Washington 6.
Baskette, Jesse E., Rm. 504, 1625 K St., N. W., 7th Fl., Washington 6.
Bateman, William James, Interstate Comm. Com., Washington 25.
Baughman, Wilbur N., 717 Barr Bldg., Washington 6.
Beasley, Cecil A., Jr., 912 American Securi., Washington.
Beauregard, Henry G., 1200 18th St., N. W., Washington 6.
Bechhoefer, B. G., 2943 Benton Place, N. W., Washington 8.
Bechtel, Gene A., 1002 Ring Bldg., Washington 6.
Becker, Arthur M., 839 17th St., N. W., Washington 6.
Beelar, Donald C., World Center Bldg., Washington 6.
Beitel, Albert F., 905 American Sec., Washington 5.
Bell, Martin W., Commonwealth Bldg., Washington 6.
Berger, Raoul, 1108 Sixteenth N. W., Washington 6.
Bernhard, Russell S., 1625 K St., N. W., Washington 6.
Bernhardt, James Curry, 6274 29th St., N. W., Washington 15.
Bierbower, James J., 1625 K St., N. W., Washington 6.
Bingham, Herbert M., Tower Bldg., Washington 5.
Blum, William, Jr., 1741 K St., N. W., Washington 6.
Bolton-Smith, Carlile, 3007 Que St., N. W., Washington 7.
Booth, Robert M., Jr., Bowen Bldg., Washington.
Boskey, Bennett, 1701 K St., N. W., Washington 6.
Bowen, Harry A., 500 Wyatt Bldg., Washington 5.
Breithaupt, Harry J., Jr., 927 Transport Bldg., Washington 6.
Broadbent, Lorin J., 744 Jackson Pl., N. W., Washington 6.
Brookhart, Smith W., 1700 K St., N. W., Washington 6.
Brooks, Leon R., 1735 De Sales St., N. W., Washington 6.
Brooks, Neil, 3215 Morrison, N. W., Washington 15.
Broun, E. Fortaine, 616 Transportation, Washington 6.
Brown, Frank X., 1625 Eye St., N. W., Washington 6.
Brown, Thad H., 1771 N St., N. W., Washington 6.
Buchanan, Lloyd, 4616 47th St., N. W., Washington 16.
Burt, Wiliam C., 1000 Vermont Ave., N. W., Washington 5.
Burton, Cameron, Investment Bldg., Washington 5.
Carton, Arthur B., 1346 Conn Ave., N. W., Rm. 1009, Washington 6.
Casey, John T., 1010 Vermont Ave., N. W., Washington 5.

DISTRICT OF COLUMBIA—Cont'd

Cleary, John M., 707 Munsey Bldg., Washington 4.
Coburn, George M., 3405 Ordway St., N. W., Washington 16.
Cochran, Dean F., 505 Transportation Bldg., Washington 6.
Cohen, Stanley B., 317 Cafritz Bldg., Washington.
Cohen, Wallace M., 1832 Jefferson Place, N. W., Washington 6.
Cole, Alan Y., 815 15th St., N. W., Washington 5.
Coles, Marvin J., 1000 Conn Ave., N. W., Washington 6.
Colladay, Edward F., 1331 G St., N. W., Washington 5.
Collier, Robert A., 1700 K St., N. W., Washington 6.
Collins, Linton M., 1100 Tower Bldg., Washington 5.
Collins, Miss Patricia, Dept. of Justice, Washington 25.
Conner, John D., 1625 K St., N. W., 7th Fl., Washington 6.
Connole, William R., 2848 Fed. Power Commission, Washington 25.
Connor, J. Parker, 300 Southern Bldg., Washington 5.
Cook, William H., 3601 Wis Ave, N. W., Apt. 307, Washington 16.
Coombs, Lynn O., 918 F St., N. W., Washington 4.
Cooper, Evelyn N., 1025 Connecticut Ave., N. W., Washington.
Corber, Robert Jack, 1100 Shoreham Bldg., Washington 5.
Corkey, James E., 1032 Shoreham Bldg., Washington 5.
Cottone, Benedict P., 1001 Conn. Ave., N. W., Rm. 1228, Washington 6.
Counihan, Donald M., 1000 Conn. Ave., N. W., Washington 6.
Cragun, John W., 44 Jackson Pl., N. W., Washington 6.
Craig, William L., Lt. Jg., 3835 Beecher St., N. W., Washington 7.
Craighill, G. Bowdoin, Jr., 901 Folger Bldg., Washington 5.
Crampton, Scott P., 815 Bowen Bldg., Washington 5.
Creyke, Geoffrey, Jr., 400 Washington Bldg., Washington 5.
Crook, James R., Jr., 723 13th St., N. W., Washington 5.
Cross, John W., 729 15th St., N. W., 5th Fl. Washington 5.
Crow, Harvey M., 918 16th St., N. W., Washington 6.
Cuneo, Gilbert A., 5108 Lawton Drive, Washington 16.
Cunningham, Elmer M., Continental Bldg., Washington 5.
Cunningham, J. D., 3606 16th St., N. W., Washington 10.
Cunningham, John, 529 Tower Bldg., Washington 5.
Cutler, Mitchell Stein, 710 14th St., N. W., Washington 5.
Daniel, Paul, 710 Ring Bldg., Washington 6.

DISTRICT OF COLUMBIA—Cont'd

Daniels, Richard D., 635 Washington Bldg., Washington 5.
Danzansky, Joseph B., 1406 G St., N. W., Washington 5.
Davis, Clarence A., 1625 K St., N. W., Rm. 203, Washington 6.
Davis, Ross D., Small Business Adm., Washington 25.
Deale, Valentine B., 1001 Connecticut, Washington 6.
Delany, Frank Joseph, 1317 F St N. W., R206 Washington 4.
Deming, Willis Riley, 311 Investment Bldg., Washington 5.
Denbo, Milton C., 1625 K St. N. W., Washington 6.
Denning, William I., 1518 K St., N. W., Washington 5.
De Seife, Rodolphe J. A., 1305 Juniper St., N. W., Washington 12.
Dillon, Timothy V. A., 1001 15th St., N. W., Washington.
Dinwoodey, Dean, 24th & N St., Washington 7.
Dobin, Paul, 317 Cafritz Bldg., Washington 6.
Doerfer, John C., New Post Office Bldg., Washington.
Donelan, John F., 707 Munsey Bldg., Washington 4.
Donnelly, Horace J., Jr., 730 15th St., N. W., Washington 5.
Doty, Dale E., 1028 Conn. Ave., N. W., Rm. 820, Washington 6.
Douglas, John Woolman, 701 Union Trust Bldg., Washington 5.
Doyle, Richard S., 404 Transprtn. Bldg., Washington 1.
Dreos, George C., 1500 H St., N.E., Washington 2.
DuCoeur, Joseph, 800 World Center Bldg., Washington 6.
Duff, William R., 1323 Wyatt Bldg., Washington 5.
Dunn, William E., Assoc. Gen. Contractors Amer., 20th & E Sts., N. W., Washington 6.
Duvall, Donald Knox, 4949 Lowell St., Washington 16.
Eagan, R. Russell, 800 World Center Bldg., Washington 6.
Edelstein, Harry M., 1700 K St., N. W., Washington 6.
Efron, Samuel, 3705 Porter St., N. W., Washington 16.
Elkins, Emerson K., 2800 Woodley Rd., N. W., Washington 8.
Elliott, Kelso, 1100 Bowen Bldg., Washington 5.
Ellison, Newell W., 701 Union Trust Bldg., Washington.
Ely, Northcutt, Tower Bldg., Washington 5.
Ewers, Ira L., 1000 16th St., N.W., Rm. 401, Washington 6.
Fanelli, Joseph A., 1701 K St., N. W., Washington 6.
Farmer, Guy, 1100 Shoreham Bldg., Washington 5.
Ferguson, John A., 918 16th St., N. W., Washington 6.
Fierst, Herbert A., Ring Bldg., Washington 6.

DISTRICT OF COLUMBIA—Cont'd

Fisher, Adrian S., 1515 L St., N. W., Washington 5.
Fisher, Ben C., 703 Perpetual Bldg., Washington 4.
Fistere, Charles M., 1012 14th St., Washington 5.
Flaningam, Norman A., 744 Pennsylvania Bldg., Washington 4.
Fletcher, Frank U., 1023 Munsey Bldg., Washington 4.
Fletcher, Lloyd, Jr., 1300 Connecticut Ave., N. W., Washington 6.
Foulis, Ronald J., 1001 Conn. Ave., N. W., Washington 6.
Fowler, Henry Hamill, 1701 K St., N. W., Washington 6.
Fox, Lawrence A., U. S. Dept. of Commerce, Washington 25.
Frank, Roy C., 717 27 Barr Bldg., Washington 6.
Freedman, Walter, 1000 Conn. Ave., Washington 6.
French, James H., Jr., 1625 K St., N. W., Washington 6.
Freret, Mrs. Elizabeth S., 501 Commonwealth Bldg., Washington 6.
Friedman, Martin L., 425 13th St., N. W., R 923, Washington 4.
Fullerton, Hugh 2441 Tracy Place, N. W., Washington 8.
Furman, John Pryor, 1523 L St., N. W., Washington 5.
Futor, Norman J., Just. Dept., Antitrust Div., Personal, Washington.
Gaguine, Benito, 3628 Appleton St., N. W., Washington 8.
Gallagher, Bernard J., Union Trust Bldg., Washington.
Gantt, Paul H., 3526 Edmunds St., N. W., Washington 7.
Gardner, Warner W., 734 15th N. W., Washington 5.
Garrett, Paul W., 2814 Conn. Ave., N. W., Washington 8.
Garrity, Raymond F., 301 Tower Bldg., Washington.
Garstang, Marion R., 1731 Eye St., N. W., Washington.
Gaskins, John W., 1620 Eye St., N. W., Washington 6.
Gatchell, Willard W., 4409 Windom Pl., N. W., Washington 16.
Geiger, Irwin, 102 Tower Bldg., Washington 5.
Gilliam, Carroll L., 600 Munsey Bldg., Washington 4.
Ginnane, Robert W., 3323 Interstate Com., Washington.
Glenn, Mary Frances, 3039 Oliver St., N. W., Washington 15.
Glick, David, 1501 New House Office Bldg., Washington 25.
Gobetz, Harvey, 2145 K St., N. W., Washington 7.
Goff, Col. Abe McGregor, Interstate Commerce Comm., Washington 25.
Goodrich, Hon. Edgar J., 1200 18th St., N. W., Washington 6.
Gorman, Joseph R., Associations Bldg., Washington 6.
Gormley, Donald Charles, 744 Jackson Pl., N. W., Washington 6.

DISTRICT OF COLUMBIA—Cont'd

Gosnell, John A., 1145 19th St., N. W., Washington 6.
Grimes, Weston B., 1001 Bowen Bldg., Washington 5.
Groner, Isaac N., 1701 K St., N. W., Washington 6.
Gubin, E. K., 1025 Conn. Ave., N. W., Washington 6.
Guthery, Upton K., 3733 Van Ness St., N. W., Washington 16.
Habberton, Benjamin G., 1012 14th St., N. W., Washington 5.
Hamel, Charles D., 1000 Shoreham Bldg., Washington 5.
Hand, Frank B., Jr., Transportation Bldg., Washington 6.
Hanes, Chisman, 710 Ring Bldg., Washington 6.
Harris, Stanley S., 810 Colorado Bldg., Washington 5.
Harrison, Charles M., 725 13th St., N. W., Washington 5.
Hayes, John C., 945-49 Munsey Bldg., Washington 4.
Heald, Robert L., 1023 Munsey Bldg., Washington 4.
Hedrick, F. Cleveland, Jr., 1001 Conn. Ave., N. W., Washington 6.
Heltzel, Charles H., 606 Commerce Bldg., Washington 6.
Hickey, William J., 2000 Mass. Ave., N. W., Washington 6.
Highsaw, James L., Jr., 620 Tower Bldg., Washington 5.
Hobbs, Charles Allen, 744 Jackson Place, N. W., Washington 6.
Hobbs, Claude E., Jr., 1000 Conn. Ave., N. W., Rm. 1004, Washington 6.
Hogan, Wm. Joseph, Jr., 2122 Calif. St., N. W., 257, Washington 8.
Hollman, Lawrence D., 710 Ring Bldg., Washington 6.
Hope, Robert S., 529 Tower Bldg., Washington 5.
Howrey, Edward F., 1707 H St., N. W., Washington 6.
Hudson, Minor, Washington Bldg., Washington 5.
Humphrey, Miss Helen F., 1025 Conn. Ave., N. W., Washington 6.
Hynning, Clifford J., 1821 Jefferson, N. W., Washington 6.
Irwin, Robert A., Ring Bldg., Washington 6.
Jaffee, Samuel H., 912 DuPont Circle, Washington 6.
Jay, J. Edward, 1711 Surrey Lane, N. W., Washington 7.
Jenkins, Joseph A., 4600 Conn. Ave., N. W., Apt. 220, Washington 8.
Jenks, Thomas E., 5044 Millwood Lane, Washington 11.
Jennes, Ernest W., 701 Union Trust Bldg., Washington 5.
Johnson, Stanfield B., 1710 H St., N. W., Washington 6.
Johnston, Charles Robt., 918 16th St., N. W., Washington 6.
Jones, Albert A., 1105 National Press Bldg., Washington 4.
Jones, F. Addison, 3060 16th St., N. W., Washington.

DISTRICT OF COLUMBIA—Cont'd

Jones, William B., Union Trust Bldg., Washington.
Jorgensen, Norman E., 514 Wyatt Bldg., Washington 5.
Kaler, James Llewellyn, 6103 Crowell Drive, Washington 16.
Kanfer, Morris, 815 15th St., N. W., Washington 5.
Karrick, David Brewer, 1420 U St., N. W., Washington 9.
Kassel, Leonard J., ICC Bldg., Cons X12, N. W., Washington 25.
Kendall, David W., 205 The White House, Washington 25.
Kennedy, B. R., 4000 Cathedral Ave., N. W., 342, Washington 16.
Kennedy, Harold L., 420 Cafritz Bldg., Washington 6.
Kennedy, Joseph B., Jr., 1707 H St., N. W., Washington 6.
Kenney, William John, 804 Ring Bldg., Washington 6.
Kilpatrick, H. C., 912 Amer. Sec. Bldg., Washington 5.
King, Thomas Bertram, 812 Pennsylvania Bldg., Washington 4.
Kintner, Earl W., 3037 Dent Place, N. W., Washington 7.
Kistler, H. Donald, 1100 Tower Bldg., Washington.
Kittner, Joseph M., 1735 Desales St., N.W., Washington 6.
Klagsbrunn, Hans A., 1200 18th St., N. W., Washington 6.
Kline, Arthur, Federal Power Comm., Washington 16.
Koehler, John T., 5806 Cedar Parkway, Washington.
Kominers, Odell, 529 Tower Bldg., Washington 5.
Koplovitz, William C., 938 Bowen Bldg., Washington 5.
Lane, John Francis, 401 Commonwealth Bldg., Washington 6.
Law, Glen R., 3806 Jenifer St., N. W., Washington 15.
Lawton, Henry C., 5301 New Hampshr., N. W., Washington 11.
Layne, A. Alvis, Jr., Pennsylvania Bldg., Washington 4.
Lazarus, Arthur, Jr., 1700 K St., N. W., Washington 6.
Lear, Coates, 412 Cafritz Bldg., Washington 6.
Leasure, C. Edward, 1701 K St., N. W., Washington.
Lee, Mrs. Dorothy McC., 2618 30th St., N. W., Washington 8.
Lee, Frederic P., 812 Ring Bldg., Washington 6.
Leva, Marx, 1701 K St., Washington 6.
Levenberg, Gerry, 701 Union Tr., Washington.
Leventhal, Harold, 1632 K St., N. W., Washington 6.
Levine, Miss Selma M., 1001 Connecticut Ave., N. W., Washington 6.
Levy, Arnold, 1000 Conn. Ave., N. W., Rm. 411, Washington 6.
L'Heureux, Robert Dolor, 721 Albee Bldg., Washington 5.
Linden, S. K., 1001 Connecticut, N. W., Washington.

DISTRICT OF COLUMBIA—Cont'd

Littman, Harry S., 777 14th St., N. W., Washington 5.
Litvin, Mrs. Fanney N., 2800 Quebec St., N. W., Apt. 1022, Washington 8.
Loos, Dickson R., 707 Munsey Bldg., Wahsington 4.
Loos, Karl D., Munsey Bldg., Washington 4.
Louis, Max C., Amer. Security Bldg., Washington 5.
Lovett, Eliot C., 734 15th St., N. W., Washington 5.
Lowenstein, Robert, 6601 Tulip Hill Terrace, Washington 16.
Lynham, John M., 312 Colorado Bldg., Washington 5.
Lynn, Marshall H., 3119 38th St., N. W., Washington.
Lyon, Richard K., 700 Wyatt Bldg., Washington 5.
MacCracken, William P., 1000 Connecticut Ave., Washington 6.
MacDonald, David Grant, 1625 K St., N. W., Washington 6.
Mack, James E., 1028 Connecticut Ave., N. W., Washington 6.
MacLeay, Donald, 1625 K St., N. W., Washington 6.
Mahoney, William G., 620 Tower Bldg., Washington 5.
Major, Linwood C., Jr., 2001 Massachusetts, Washington 6.
Mander, Charles Wm., 1025 Conn. Ave., N. W., Washington 6.
Mann, Julius David, Jr., 425 13th St., N. W., Rm. 1230, Washington 4.
Marenberg, Philip Paul, 3900 16th St., N. W., Washington 11.
Markel, Michael F., 522 Munsey Bldg., Washington 4.
Marks, Leonard H., 317 Cafritz Bldg., Washington 6.
Marmet, Robert A., 816 Conn. Ave., Washington 6.
Marshall, Burke, 701 Union Trust Bldg., Washington 5.
Mason, Lowell B., 1025 Conn. Ave., N. W., Washington 6.
Mathis, Charles R., Jr., 1000 Vermont Ave., N. W., Washington 5.
May, Albert E., 2331 Cathedral Ave., N. W., Washington 15.
McAllister, Lambert, 2000 K St., N. W., Washington 6.
McCauley, Alfred R., 1108 16th St., N. W., Washington 6.
McClure, John E., 1710 H St., N. W., Rm. 405, Washington 6.
McDonald, Joseph A., 1240 19th St., N. W., S. & H. Bldg., Washington 6.
McDonnell, Joseph T., 425 13th St., N. W., Washington 4.
McDonnell, William F., Tower Bldg., Washington 5.
McDowell, Joseph E., 1625 K St., N. W., Washington 6.
McElwain, Edwin, 701 Union Tr. Bldg., Washington 5.
McIlwain, Samuel D., 1523 L St., N. W., Washington 5.
McGee, Charles E., 1145 19th St., N. W., Washington 6.

DISTRICT OF COLUMBIA—Cont'd

McGlothlin, James H., 701 Union Trust Bdg., Washington 5.
McGovern, William L., 1229 19th St., N. W., Washington 5.
McIntire, John A., 5317 Carvel Rd., N. W., Washington 16.
McWhorter, John A., Jr., 1620 Eye St., N. W., Washington.
Meeker, Thomas G., Securities & Exchng., Washington 25.
Midlen, John H., Munsey Bldg., Washington 4.
Miller, Herbert J., Jr., 800 World Center Bldg., Washington 6.
Miller, Lambert H., 918 16th St., N. W., Washington 6.
Miller, Neville, 4715 Berkeley Terrace, Washington 7.
Miller, Thormund A., 205 Transprtn Bldg., Washington 6.
Miller, Vernon X., 1323 18th St., N. W., Washington.
Miller, William E., 1100 Shoreham Bldg., Washington 5.
Mintener, Bradshaw, 1741 K St., N. W., Washington 6.
Mitchell, John J., 5421 31st St., N. W., Washington 15.
Mitchell, William, 1114 Ring Bldg., Washington 6.
Mollenhoff, Clark R., 852 Nat'l. Press Bldg., Washington 4.
Molnar, Miss Lorie M., 3850 Tunlaw Road, N. W., Washington 7.
Moloney, William M., Transportation Bldg., Washington 6.
Montgomery, Donald O'D., 1336 Wyatt Bldg., Washington 5.
Moorhead, Harley G., 3302 Woodbine, Washington 15.
Morgan, Edward P., 710 14th St., N.W., Washington 5.
Morrow, Giles, 1012 14th St., N. W., #401, Washington 5.
Moss, Robert Sheriffs, 815 15th St., N. W., Washington 5.
Mullin, Eugene F., Jr., 4416 Yuma St., N. W., Washington 16.
Murchison, David C., 1707 H St., N.W., Washington 6.
Murphy, Miss Charlotte, P. O. Box 7783, Washington 4.
Murray, James A., 4529 Verplanck, N. W., Washington 16.
Murville, Dean A., Off. Gen. Counsel P. O. Dept., Washington 25.
Nail, Edwin S., 1240 19th St., N. W., Washington 6.
Nathan, Hans A., 729 15th St., N. W., Washington 5.
Nehemkis, Peter R., Jr., 1700 K St., N. W., Washington 6.
Nelson, C. Roger, 617 Barr Bldg., Washington 6.
Noble, Ben Paul, 214 P. Street, N. W., Washington 7.
Nolan, John Stephan, 1001 Connecticut, N. W., Washington 6.
O'Connell, Quinn, 1225 19th St., N. W., Washington 6.
O'Hara, Francis J. Jr., 1625 K St., N. W., Washington 6.

DISTRICT OF COLUMBIA—Cont'd

Oulahan, Courts, 3214 Reservoir Rd., N. W., Washington 7.
Pace, Russell B., Jr., 800 Colorado Bldg., Washington 5.
Palmes, Gaines V., Tower Bldg., Washington 5.
Panzer, Irving R. M., 1735 De Sales St., N. W., Washington 6.
Parriott, James D., 5021 Allan Rd., Washington 16.
Parrish, Robert M., 6303 Massachusetts Ave., Washington 16.
Patrick, D. M., 810 Colorado Bldg., Washington 5.
Perlman, T. S. L., 529 Tower Bldg., Washington 5.
Perry, Richard L., 2400 41st St., N. W., Apt. 401, Washington 7.
Phelan, Arthur J., Colorado Bldg., Washington 5.
Pickens, John K., 731 Washington Bldg., Washington 5.
Pike, Henry H., 1869 Wyoming Ave., N. W., Washington 9.
Pilzer, Charles Jay, 1407 L St., N. W., Washington 5.
Plaine, Herzel H. E., Atomic Energy Comm., Washington 25.
Plotkin, Harry M., 1002 Ring Bldg., Washington 6.
Pogue, L. W., Southern Bldg., Rm. 730, Washington 5.
Potts, Ramsay D., Jr., 910 17th St., N. W., Rm. 412, Washington 6.
Poulton, Louis P., 1300 Connecticut, N. W., Washington 6.
Powell, Bolling R., Jr., 1741 K St., N. W., Washington 6.
Pratt, John H., 905 Amer. Sec. Bldg., Washington 5.
Prettyman, Barrett, Jr., 5308 Ventnor Rd., Washington 16.
Purcell, Ganson, Barr Bldg., Washington 6.
Pyburn, Keith M., 425 13th St., N. W., Washington 4.
Ramsey, Mary Louise, 2310 Connecticut Ave., Washington 8.
Rawalt, Miss Marguerite, 1801 16th St., N. W., Washington 9.
Rea, Bryce, Jr., Munsey Bldg., Washington 4.
Reidy, Edward M., 205 Transportn. Bldg., Washington.
Reifsnyder, C. Frank, 810 Colorado Bldg., Washington 5.
Reilly, Gerard D., 1401 K St., N. W., Washington 5.
Reilly, James F., 1625 K St., N. W., Washington 6.
Rhodes, Paul Miller, 612 Barr Bldg., Washington 6.
Rhyne, Brice W., 400 Hill Bldg., Washington 6.
Rhyne, Hon. Charles S., 839 17th St., N. W., Washington 6.
Richey, Charles R., 95 Rust Bldg., Washington 5.
Richter, Melvin, 826 Pa. Bldg., Washington 4.
Rigby, Scott G., 430 Wyatt Bldg., Washington 5.
Ring, Carlyle C., Jr., Ring Bldg., Washington 6.
Ringer, William R., Nat'l. Labor Rel. Bd., Washington 25.

DISTRICT OF COLUMBIA—Cont'd

Rivlin, Lewis Allen, 3505 30th St., N. W., Washington 8.
Roberts, Wm. Allerton, Continental Bldg., Washington 5.
Rochmes, Louis L., 711 14th St., N. W., Washington 5.
Rockefeller, Edw. S., III, 4412 Volta Place, N. W., Washington 7.
Rollo, Reed T., World Center Bldg., Washington 6.
Rollow, William E., 4807 Jamestown Road, Washington 16.
Roper, W. Crosby, Jr., 701 Union Tr. Bldg., Washington.
Rosenfield, Harry N., 1735 DeSales St., N. W., Washington 6.
Ross, Bradford, 723 15th St., N. W., Washington 5.
Ross, William Warfield, 2500 Wisconsin Ave., N. W., Washington 7.
Rowell, Russell, Munsey Bldg., Washington 4.
Roycroft, Howard F., 810 Colorado Bldg., Washington.
Rubin, Seymour J., 1675 35th St., N. W., Washington.
Russell, Percy H., Jr., World Center Bldg., Washington 6.
Scharfeld, Arthur W., National Press Bldg., Washington 4.
Schlefer, Mark P., 529 Tower Bldg., Washington 5.
Schneider, Hubert A., 815 15th St., N. W., Washington 5.
Schulsinger, Gerald G., 710 Ring Bldg., Washington 6.
Schultz, Franklin M., 910 17th St., N. W., Washington 6.
Schuyler, Wm. E., Jr., 1050 Munsey Bldg., Washington 4.
Scott, Myron, Hotel Houston, E St., S. W., Washington 24.
Seamon, Theodore I., 700 Woodward Bldg., Washington 5.
Segal, Paul M., 816 Connecticut Ave., Washington 6.
Sellers, Ashley, 1625 K St., N. W., 7th Fl., Washington 6.
Semmes, John Gibson, 1000 Conn. Ave., N. W., Washington 6.
Shannon, Charles V., 1700 K St., N. W., Washington 6.
Shannon, Thomas Francis, 1700 K St., N. W., Rm. 905, Washington 6.
Sharp, James R., 1108 16th St., N. W., Washington 6.
Shea, Francis M., 734 15th St., N. W., Rm. 1106, Washington 5.
Shear, Daniel H., 7013 Interior Bldg., Washington 25.
Sheble, Walter Franklin, 1025 Conn. Ave., N. W., 518, Washington 6.
Sheffield, Malvern J. Jr., 1700 K St., N. W., Washington 6.
Sheriff, Seymour, 1126 Woodward Bldg., Washington 5.
Siciliano, Rocco C., 3924 Macomb St., N. W., Washington 16.
Simonds, Jerome H., 1000 Conn. Ave., N. W., Washington 6.
Slaughter, Harrison T., 1007 Ring Bldg., Washington 6.

DISTRICT OF COLUMBIA—Cont'd

Slaughter, Herbert J., Dept. of the Interior, Washington 25.
Smalley, Miss Ruth, 211 3rd St., S. E., Washington 3.
Smethurst, Raymond S., 600 Investment Bldg., Washington 5.
Sims, William P., 600 Munsey Bldg., Washington 4.
Smith, Edward S., 404 Transprtn. Bldg., Washington 6.
Smith, Mrs. Elizabeth C., 3000 Tilden St., N. W., Washington 8.
Smith, George S., 1240 19th St., N. W., Washington 6.
Smith, Joseph J., Jr., 810 Colorado Bldg., Washington 5.
Smithey, Wayne H., 1200 Wyatt Bldg., Washington 5.
Smoot, Charles Effinger, Fed. Communic. Commis., Washington 25.
Solomon, Frederic, Fed. Reserve System, Washington 25.
Somers, A. Norman, 4519 Alton Pl., N. W., Washington 16.
Sonosky, Marvin J., 1028 Connecticut Ave., Washington 6.
Spingarn, Stephen J., 1900 Que St., N. W., Washington 9.
Spriggs, Kahl K., 504 Southern Bldg., Washington 5.
Stambler, Arthur, 752 National Press Bldg., Washington 4.
Stephen, John Erle, 1000 Connecticut Ave., N. W., Washington 6.
Stitt, Nelson A., 1000 Conn. Ave., N. W., Washington 6.
Stone, Franklin M., 4801 Conn. Ave., N. W., Washington 8.
Stout, Clair L., Munsey Bldg., Washington 4.
Streeter, Miss Laurie M., 1713 Rhode Is., N. W., Washington 6.
Strube, Donald E., Interstate Comm. Com., Washington 25.
Strupp, Werner, 1735 DeSales St., N. W., Washington 6.
Surrey, Walter S., 1116 Woodward Bldg., Washington 5.
Sutherland, William A., Ring Bldg., Washington 6.
Sweeney, Edward C., 3300 Nebraska Ave., N. W., Washington 16.
Symington, A. Lloyd, 1701 K St., Washington 6.
Taubeneck, Theodore D., U. S. Treasury Dept., Off. G. C., Washington 25.
Tayloe, William C., 1030 Woodward Bldg., Washington 5.
Temko, Stanley L., 701 Union Trust Bldg., Washington 5.
Timberg, Sigmund, 815 15th St., N. W., Washington 5.
Todd, C. D., Jr., 1825 Jefferson Pl., N. W., Washington 6.
Townshend, Aaron R., 1131 Munsey Bldg., Washington 4.
Toye, F. Gerald, Wyatt Bldg., Washington 5.
Trimble, South, Jr., Woodward Bldg., Washington 5.
Tuggle, Kenneth H., Interstte. Comm. Comm., Washington 25.

DISTRICT OF COLUMBIA—Cont'd

Turney, Jack R., Jr., 2001 Msschstt. Av., N. W., Washington 6.
Turney, John R., 2001 Mass. Ave., N. W., Washington 6.
Turney William O., 2001 Msschstt. Av., N. W., Washington 6.
Underhill, Wm. Amory, 1625 K St., N. W., Washington 6.
Volpe, Joseph, Jr., 1701 K St., Washington.
vonBaur, F. Trowbridge, Main Navy Bldg., Washington 25.
Wachtel, Isidore H., 1000 Connecticut Ave., Washington 6.
Wagner, Warren H., 1031 Investment Bldg., Washington 5.
Walker, Wallace H., 5315 Msschstt. Av., N. W., Washington 16.
Wall, Thomas H., 600 Munsey Bldg., Washington 4.
Warner, Sturgis, 1116 Ring Bldg., Washington 6.
Wasserman, Jack, 4405 Sedgwich St., N. W., Washington 16.
Watson, Robert C., U. S. Patent Office, Washington 25.
Webb, William H., 1028 Connecticut Ave., N. W., Washington 6.
Weinmann, Eric, 1620 30th St., N. W., Washington 7.
Welch, Francis X., 425 13th St., N. W., Rm. 332, Washington 4.
Welch, Vincent B., 710 14th St., N. W., Washington 5.
Werner, Jack, 777 14th St., N. W., Washington.
Westwood, Howard C., Union Trust Bldg., Washington 5.
Whalen, Frank James, Jr., 2000 Mass. Ave., N. W., Washington 6.
Whelan, Prof. John W., 506 E St., N. W., Washington 1.
Wilkins, Richard Rulon, 744 Jackson Place, N. W., Washington 6.
Wilkinson, Glen A., 744 Jackson Pl., N. W., Washington 6.
Williams, Edward Brown, 411 Washington Bldg., Washington 5.
Williams, James D., Jr., 734 15th St., N. W., Washington 7.
Willis, John W., 1735 De Sales St., N. W., Washington 6.
Wilner, Morton H., 700 Wyatt Bldg., Washington 5.
Wilson, Miss Louisa, 2818 Wisc. Ave., N. W., Washington 7.
Wimbish, Robert Allan, P. O. Box 1808, Washington 13.
Winchell, Comm. John H., 5905 Osceola Rd., N. W., Washington 16.
Winn, Arthur L., Jr., Continental Bldg., Washington 5.
Wohlstetter, Alan F., 1518 K St., N. W., Washington 5.
Wolf, Justin R., 1625 K St., N. W., Washington 6.
Worsley, James R., Jr., 710 Ring Bldg., Washington 6.
Wright, Dale Alan, 5017 Rodmon Rd., N. W., Washington 16.

FLORIDA

Alley, Raymond C., 250 S. County Road, Palm Beach.
Blackwell, T. J., 100 N. E. First Ave., Miami 32.
Bowden, Otto Roy Thomas, 401 Smith Bldg., Jacksonville 2.
Carlton, Doyle E., P. O. Box 3239, Tampa 1.
Collins, J. Ernest, P. O. Box 517, Panama City.
Cork, T. C., Roe Bldg., Clermont.
Courshon, Arthur H., 235 Lincoln Rd., Miami Beach 39.
Farrior, J. Rex, 709 Franklin St., Tampa 2.
Feibelman, Herbert U., P. O. Box 750, Miami 5.
Fokes, W. Robert, 400 Midyette Moor Bg., Tallahassee.
Fowler, Cody, 1002 Citizens Bldg., Tampa 2.
Hall, Warren Esterly, Jr., P. O. Box 958, De Land.
Hamilton, Theo, 1056 Hendricks Ave., Jacksonville 7.
Hector, Louis J., DuPont Bldg., Miami 32.
Hendry, Hon. W. Marion, County Courthouse, Tampa 2.
Hulmes, Donald W., 6020 Washington St., W. Hollywood.
Johnson, Counts, P. O. Box 2349, Tampa, 1.
Johnson, Lucius Counts, P. O. Box 2349, Tampa, 1.
Kanzer, Lawrence, 1342 Nulic St., Tallahassee.
Lippmann, Mrs. Betty S., 239 Walnut St., Orlando.
Maguire, Hon., R. F., 135 Wall St., Orlando.
McCarthy, A. L., 1414 1st Nat'l. Bank Bldg., Miami 32.
McDonough, James B., Jr., 308 Tampa St., Rm. 320, Tampa 2.
McMullen, D. Fred, P. O. Box 391, Tallahassee.
Miller, George J., 543 Ingraham Bldg., Miami 32.
Minnet, James F., Television Bldg., Ft. Lauderdale.
Pope, Calvin Adams, Tampa Theatre Bldg., Tampa 1.
Prevatt, Preston G., 1010 1st Nat'l. Bank Bldg., Miami 32.
Pucci, Gerard R., 975 S. W. 37th Ave., Miami 35.
Reeb, F. William, 4670 Lakeview Ave., St. Petersburg 11.
Russell, Clifford A., 538 Pan American Bk. Bldg., Miami 32.
Rust, Robert Warren, Federal Bldg., Box 1070, Miami.
Santa Cruz, Steven A., 1521½ E. Broadway, Rm. 12-13, Tampa 5.
Scarlett, Joseph A., III, 142 W. Indiana Ave., De Land.
Schwartz, Dan R., 713 Professional Bldg., Jacksonville 2.
Shackleford, T. M., Jr., 700 Tampa Theatre, Tampa.
Smith, Dorothy Ashley, 111 S. E. 6th St., Ft. Lauderdale.
Swerdlin, Sanford M., 819 Seybold Bldg., Miami 32.
Walters, David W., 1008 Ainsley Bldg., Miami.

FLORIDA—Cont'd

Wells, J. R., P. O. Box 633, Orlando.
Wood, John R., P. O. Box 5098, Sarasota.
Yancey, Hervey, 1301 DuPont Bldg., Miami 32.

GEORGIA

Brennan, Joseph B., 1516 1st Nat'l. Bk., Atlanta 31.
Candler, John S., 410 Palmer Bldg., Atlanta.
Constangy, Frank A., 1404 Candler Bldg., Atlanta 3.
Cosper, Harvey L., 2561 Ridgewood Terrace, N. W., Atlanta 18.
Crimm, Reuben G., 805 Peachtree Bldg., Atlanta 5.
Davidson, J. Q., P. O. Box 1199, Columbus.
Dickens, Gordon Lee, 105 Broad St., Sparta.
Forbes, Theo. McCoy, Jr., 825 C & S Bk. Bldg., Atlanta 3.
Friedin, Roy B., Hargrove Bldg., Vienna.
Haines, C. Waldo, 68 Spring St., N. W., Atlanta.
Harlan, W. Glen, 825 C & S Bk. Bldg., Atlanta 3.
Howell, Hugh H., Jr., 511 Connally Bldg., Atlanta 3.
Jones, C. Baxter, Persons Bldg., Macon 1.
Kell, D. Franklin, 1602 Healey Bldg., Atlanta.
Maurer, Richard S., Delta Airlines V. Pres., Atla. Airport, Atlanta.
McKenna, Terry P., 825 Cit. & Sou. Nat'l. Bk. Bld., Atlanta 3.
Miller, Prof. Arthur S., Emory Univ. Law School, Atlanta 22.
Parker, Benjamin M., 1203 1st Nat'l. Bk. Bld., Atlanta 3.
Reeves, Rex Thames, 304 5 Candler Bldg., Atlanta 3.
Riddick, L. Roy, P. O. Box 670, Savannah.
Rox, Frank F., Delta Airlines Atty., Atla. Airport, Atlanta.
Russell, Harold L., 825 Cit. & So. Nat. Bk., Atlanta 3.
Scott, William E., Jr., Fulton Federal Bldg., Atlanta 3.
Sizemore, Lamar W., 175 C & S Nat'l. Bank Bldg., Atlanta 3.
Smoak, George W., P. O. Box 1578, Albany.
Sullivan, John J., 208 E. Bay St., Savannah.
Wade, Allison, 825 C. & S. Bank Bldg., Atlanta 3.

HAWAII

Anthony, J. Garner, P. O. Box 3199, Honolulu 1.
Lum, Richard M. C., 90 N. King St., Rm. 204, Honolulu 13.

IDAHO

Furey, Sherman F., Jr., P. O. Box 42, Salmon.
Lyman, George Edward, 8 College Ave., Rexburg.

ILLINOIS

Ahern, Rufus C., 2349 Roscoe St., Chicago 18.
Banahan, Miss Lillian M., 155 Park Blvd., Glen Ellyn.
Barker, Robert Clyde, The Northern Trust, Chicago 90.
Becker, Benjamin M., 111 W. Washington, Chicago 2.
Belnap, Nuel D., 1 N. La Salle St., Chicago 2.
Bennett, Donald Vinton, 69 W. Washington St., Chicago 2.
Bernstein, Eugene, 77 W. Washington St., Chicago 2.
Bertrand, Bernard H., 234 Collinsville Ave., E. St. Louis.
Blender, Miss Dorothea, 4025 W. Peterson Ave., Chicago 30.
Boand, Charles W., 120 W. Adams St., Chicago 3.
Bowen, Herldon H., 135 S. La Salle St., Chicago 3.
Boynton, Ben B., 501 Security Bldg., Springfield.
Brody, Robert L., 330 S. Wells St., Chicago 6.
Bullard, Edward M., 72 W. Adams St., Chicago 3.
Burchmore, Robert N., 2106 Field Bldg., Chicago.
Burns, Martin F., 120 S. La Salle, Rm. 1816, Chicago 3.
Burns, William Grady, 135 S. La Salle St., Chicago 3.
Cascio, Anthony J., 334 S. Pulaski Rd., Chicago 24.
Cassel, Martin L., Jr., 139 W. Van Buren, Rm. 1025, Chicago 5.
Chadwell, John T., 135 S. La Salle St., Chicago 3.
Chaffetz, Hammond E., 2900 Prudential Plz., Chicago 1.
Chartrand, Joseph S., Bd. of Trade Trans., Chicago 4.
Clark, William G., 211 S. Cicero Ave., Chicago 44.
Colby, Bernard G., 1 N. La Salle St., Chicago 2.
Conaghan, Paul R., 208 S. La Salle St., 1768, Chicago 4.
Connery, John M., 122 S. Michigan Ave., Chicago 3.
Corazza, Joseph W., 113 N. Neil St., Champaign.
Cromartie, William A., 1 N. La Salle St., Chicago 2.
Davies, Bernita J., 220A Lib. Univ. Ill., Urbana.
Davies, Virginia A., 1106 N. Logan Ave., Danville.
Dickson, David L., 619 W. Chicago Ave., Chicago 10.
Dillie, James P., 72 W. Adams St., Chicago 3.
Dowd, Frank J., 10 S. La Salle St., Chicago 3.
Downs, Thomas J., 135 S. La Salle St., Chicago 3.
Durka, Stanley A., 9 S. County Street., Waukegan.
Edelman, Alvin, 100 N. La Salle St., Chicago 2.
Edmunds, Palmer D., 315 Plymouth Court, Chicago 4.
Eklund, E. A., 38 S. Dearborn St., Chicago 3.

ILLINOIS—Cont'd

Engelhardt, William R., 100 W. Monroe St., Chicago 3.
Ericsson, Robert D., 3980 Avondale Ave., Chicago 41.
Fiduccia, Charles B., 33 N. La Salle St., Chicago 2.
Fitzgerald, John O. C., 6642 N. Leoti, Chicago 30.
Fitzpatrick, Peter, 10 S. La Salle St., Rm. 1110, Chicago 3.
Flint, Sam Hall, 905 Forest Ave., Evanston.
Freeman, Richard M., 1 N. La Salle St., Rm. 315, Chicago 2.
Gibson, Jonathan C., 80 E. Jackson Blvd., Chicago 4.
Gundlach, Norman J., 606 1st Nat'l. Bk. Bldg., E. St. Louis.
Hale, G. E., 120 W. Adams St., Chicago 3.
Halfpenny, Harold T., 111 W. Washington St., Chicago 2.
Hansen, Helmer, 122 S. Michigan Ave., Chicago 3.
Hayes, Edward B., 135 S. La Salle St., Rm. 2400, Chicago 3.
Heindl, Warren A., 139 N. Clark St., Chicago 2.
Herndon, Gray, 916 Illinois Bldg., Springfield.
Hirsch, Albert, 39 S. La Salle St., Chicago 3.
Hoagland, Karl King, P. O. Box 214, Alton.
Jacobs, Joseph M., 1543 201 N. Wells St., Chicago 6.
Jennett, Clarence B., 38 S. Dearborn St., Chicago 3.
Jirgal, George H., 111 W. Monroe St., Chicago 3.
Johnson, Eugene R., 1400 1st Nat'l. Bank, Peoria 2.
Johnson, Paul M., 844 Rush St., Rm. 832, Chicago, 11.
Johnston, Edward R., 135 S. La Salle St., Rm. 3300, Chicago 3.
Jones, Clarence B., 1820 Roscoe St., Chicago, 13.
Kacheres, George Louis, 115½ S 2nd St., St. Charles.
Kargman, Wallace I., 188 W. Randolph, Rm. 620, Chicago 1.
Kasper, Miss Agnes M., 5331 N. Newland Ave., Chicago 31.
Keck, Robert C., 134 S. La Salle St., Rm. 1720, Chicago 3.
Kennedy, Thomas Hart, 832 W. 4th St., Minonk.
Kenoe, Henry W., 33 N. La Salle St., Chicago 2.
Lauterbach, Allen A., 2300 Merchandise Mt., Chicago 54.
Leibman, Morris I., 208 S. La Salle St., Chicago 4.
Lewis, Maj. Walter L., SJA Hq. Mil. Air Trans. Serv., Scott AFB.
Lloyd, Glen A., 135 S. La Salle St., Chicago 3.
Lorch, John T., 231 S. La Salle St., Chicago 4.
Loughlin, John T., 135 S. La Salle St., Rm. 3400, Chicago 3.
Lownik, Theodore F., 5501 S. Kedzie, Chicago 29.
Mathews, Amos M., 280 Union Statn Bldg., Chicago 6.
Mathews, David O., 332 S. Michigan Ave., Chicago 4.

ILLINOIS—Cont'd

McErlean, Charles F., 5959 S. Cicero Ave., Chicago 38.
Mentschikoff, Miss Soia, Univ. of Chi. Law Sch., Chicago 37.
Michel, Anthony L., 33 S. Clark St., Chicago 3.
Miller, Carl R., P. O. Box 1359, Decatur.
Milwid, Stephen A., 135 S La Salle St., Chicago 3.
Mogul, Sidney, 77 W. Washington St., Chicago 2.
Morrow, John R., 400 E. Monroe, Rm. 409, Springfield.
Mulcahy, Michael F., 33 N. La Salle St., Rm. 2128, Chicago 2.
Murphy, Richard J., 1225 La Salle St. Sta., Chicago 5.
Murtaugh, Timothy J., 231 S. La Salle St., Chicago 4.
Nathanson, Nathaniel L., 357 E. Chicago Ave., Chicago 11.
Niebank, C. George, Jr., 1211 Railway Exchange Bldg., Chicago 4.
O'Grady, George J., 122 S. Michigan Ave., R1900, Chicago 3.
O'Meara, Arthur C., 4115 Packers Ave., Chicago 9.
Ott, William H., Jr., 500 Peshtigo Court, Chicago 11.
Outlaw, Robert Sidney, 1211 80 E. Jackson Blvd., Chicago 4.
Overmyer, Franklin R., 111 W. Monroe St., Chicago 3.
Pappas, Peter V., 30 N. La Salle St., Chicago 2.
Pfeifer, Frank M., Security Bldg., Springfield.
Prangley, Curtis F., 105 W. Adams St., Chicago 3.
Rauch, George W. Jr., 140 S. Dearborn St., Chicago 3.
Raymond, Anan, 135 S. La Salle, Rm. 3300, Chicago 3.
Rosenblum, Victor G., 2026 Orrington, Evanston.
Ross, Clarence H., 122 S. Michigan Ave., Chicago 3.
Ruark, Eugene H., 208 S. La Salle St., Rm. 1768, Chicago 4.
Russell, Horace, 7 S. Dearborn St., Chicago 3.
Ryan, Frank Millington, 503 Cent. Nat'l. Bk. Bldg., Rockford.
Scher, Jacob, 1515 Arbor Ave., Highland Park.
Schroeder, Werner W., 2141 1 N. La Salle St., Chicago 2.
Schwartz, Charles P., Jr., 135 S. La Salle St., Rm. 2111, Chicago 3.
Severns, Roger L., 111 W. Washington St., Chicago 2.
Shields, Floyd F., 33 N. La Salle, Rm. 2900, Chicago 2.
Singer, Charles W., 33 N. La Salle St., Chicago 2.
Slattery, John E., 10600 S. Claremont Ave., Chicago 43.
Snorf, Lowell D., Jr., 4210 W. Peterson Ave., Chicago 46.
Snyder, Erwin P., 135 S La Salle St., Chicago 3.
Snyder, John B., 135 S. La Salle St., Chicago 3.
Souby, James M., Jr., 80 E. Jackson Blvd., Chicago 4.

ILLINOIS—Cont'd

Spencer, Edmund A., 38 S. Dearborn St., Chicago 3.
Spencer, Harold E., One N. La Salle, Chicago 2.
Sporrer, Michael J., 120 S. La Salle St., Chicago 3.
Spray, Charles Cranston, 134 S. La Salle St., Chicago 3.
Sprecher, Robert A., 100 W. Monroe St., Chicago 3.
Springer, Clement F., 327 S. La Salle St., Chicago 4.
Steadry, Frederick O., 400 W. Madison St., Chicago 6.
Stephenson, Harley A., 11 S. La Salle, Rm. 2000, Chicago 3.
Stern, Robert L., 231 S. La Salle 1955, Chicago 4.
Swain, Timothy W., 912 Central Nat'l. Bk. Bldg., Peoria.
Tedrow, James W., Automatic Elec. Co., Northlake.
Thomas, Starr, 80 E. Jackson Blvd., Chicago 4.
Tierney, Leo F., 231 S. La Salle St., Chicago 4.
Wack, Edwin O., P. O. Box 5938, Chicago 80.
Washer, Maurice, 7300 S. Yates Ave., Chicago 49.
Weiss, Jerome S., 77 W. Washington St., Chicago 2.
Wexler, Sydney B., 111 W. Washington St., Chicago 2.
Wham, Benjamin, 231 S. La Salle St., Chicago 4.
Whitman, Roland D., 122 S. Michigan Ave., Chicago 3.
Will, Hubert L., 33 N. La Salle, 31 Fl., Chicago 2.
Williams, Melville C., 33 N. La Salle St., Rm. 3200, Chicago 2.
Winter, W. Walker, 849 Willow, Winnetka.
Winters, Glenn R., 1155 E. 60th St., Chicago 37.
Wolff, Sanford I., One N. La Salle St., Chicago 2.
Woods, William F., Commercial Bk. Bldg., Champaign.
Zimmerman, Austin M., 100 W. Monroe St., Chicago 3.
Zvetina, John A., 1 N. La Salle St., Chicago 2.

INDIANA

Anderson, Frederic D., 1313 Merchants Bank Bldg., Indianapolis 4.
Bamberger, Frederick P., 806 Hulman Bldg., Evansville 18.
Bruggeman, Joseph A., Utility Bldg., Fort Wayne.
Daniels, Joseph J., 810 Fletcher Tr. Bldg., Indianapolis 4.
Early, John E., 915 Old Nat'l. Bank Bldg., Evansville 8.
Fuchs, Ralph F., 1410 E. University St., Bloomington.
Hamilton, A. Walter, Gal Ham Bldg., Bluffton.
Hirsch, Donald Carol, 130 E. Washington St., Indianapolis 4.
Ice, Harry T., 951 Consolidated, Indianapolis.
Mullen, Thomas C., Merchants Bk. Bldg., Michigan City.

INDIANA—Cont'd

Ortmeyer, Edmund F., 806 Hulman Bldg., Evansville 8.
Rutledge, Ivan C., Ind. Univ. Law Schl., Bloomington.
Ward, John Preston, 239 E. Ohio St., Indianapolis 4.
Woodford, Leon, 306 1st Nat'l. Bk., Elkhart.
Yaeger, Godfrey David, 129 E. Market St., Rm. 901, Indianapolis 4.
Young, Aribert L., 626 Fidelity Bldg., Indianapolis 4.

IOWA

Bush, Arthur Curtis, 906 Kahl Bldg., Davenport.
Graven, James H., Attorney at Law, Greene.
Gwynne, John W., 5 Woolf Ave., Apt. 8, Iowa City.
Hudson, Richard S., Drake University, Des Moines.
Lynch, Charles J., Jr., 1209 Mer. Nat'l. Bk. Bldg., Cedar Rapids.
Parker, Addison M., 500 Fleming Bldg., Des Moines 9.
Pickus, Sam G., P. O. Box 484, Sioux City 2.
Pryor, John Carlisle, 321 N. 3rd St., Burlington.
Schaetzle, Arnold F., 203 Hubbell Bldg., Des Moines 9.
Smith, Raymond A., 301 Park Bldg., Council Bluffs.
Starzinger, Vincent, Register & Tribune, Des Moines 4.
Stewart, James M., 1227 48th St., Des Moines 11.
Whitfield, Allen, Insurance Exchange Bldg., Des Moines 9.

KANSAS

Beatty, Marion, 309 Columbian Bldg., Topeka.
Davis, Hal C., 722 1st Nat'l. Bk. of Topeka, Topeka.
Dillon, M. Raymond, 604 Siebers Bldg., Kansas City 1.
Evans, Ferd Edward, Jr., 123 S. Market, Rm. 214, Wichita 2.
Gates, Louis R., 519 Comm. Nat'l. Bk. Bldg., Kansas City.
Graham, Champ, Citizens Nat'l. Bk. Bldg., Emporia.
Gray, Byron M., 530 New England Bldg., Topeka.
Morris, Lester L., 123 S. Market, Rm. 214, Wichita 2.
Painter, Geo. H., 2601 High St., Topeka.
Pope, Carroll F., 400 Brown Bldg., Wichita 2.
Reeves, J. B., Law Dept., Santa Fe, Topeka.
Smith, Dr. James Barclay, 515½ W. 14th St., Lawrence.
Treadway, William E., Santa Fe Ry. Co., Topeka.
Townsend, J. Wm., 641 Harrison St., Topeka.

KENTUCKY

Akers, Dee Ashley, 145 Sunset Drive, Frankfort.
Barnett, Bernard H., 614 Ky. Home Life Bldg., Louisville 2.

KENTUCKY—Cont'd

Borowitz, Morris B., 419 Marion E. Taylor, Louisville 2.
Bradley, Fred F., P. O. Box 127, Frankfort.
Burnley, S. A., 614 W. Walnut St., Louisville 3.
Dobie, Otis Preston, Un. of Lvlle. Law Schl., Louisville.
Fields, Wilbur O., 1529 Ky. Life Bldg., Louisville 2.
Hunley, Paul E., 1039 Seminole Trail, Frankfort.
Lester, Charles E. Jr., 8 E. 5th St., Newport.
Logan, Ralph H., 506 W. Jefferson St., Louisville 2.
Mayer, Stanley B., 1205 Ky. Home Life Bldg., Louisville 2.
Stites, Col. Henry J., 802 Starks Bldg., Louisville.
Wolford, Leo T., 501 S. Second St., Louisville 2.

LOUISIANA

Alexius, Horace R., Jr., 616 Gibson St., Covington.
Beckham, Ben, Jr., P. O. Box 147, Shreveport.
Benson, Lawrence K., 1122 Whitney Bldg., New Orleans.
Berry, Doss H., Jr., 1424 St. Rose Ave., Baton Rouge 8.
Blaisdell, James P., 308 Marine Bldg., New Orleans 12.
Brown, Dwight Moody, 227 Ricou Brewster Bldg., Shreveport.
Buckley, Elliot Ross, 309 California Co., Bldg., New Orleans 12.
Cambon, Leon Ferrier, 410 Bellaire Dr., New Orleans 24.
Darrah, L. J., 1547 Nat'l. Bank Comm. Bldg., New Orleans 12.
Fuller, Hoffman F., Tulane U. School of Law, New Orleans 18.
Koorie, Albert B., 226 Carondelet St., New Orleans 12.
Lang, Samuel, 800 Whitney Bldg., New Orleans 12.
Madison, George T., P. O. Box 510, Bastrop.
Rubin, Alvin B., P. O. Box 1588, Baton Rouge 1.
Simon, Fred, P. O. Box 1726, Shreveport.
Stafford, Grove, 311 Guaranty Bk. Bld., Alexandria.
Tucker, John H., Jr., 1300 Beck Bldg., Shreveport.
Van Atta, Rex W., 5659 Woodlawn Place, New Orleans 24.
Weinstein, Robert, 624 Whitney Bldg., New Orleans 12.
Williams, Thomas A., 1028 Whitney Bldg., New Orleans 12.
Wood, C. C., P. O. Box 4125 CA Sta., Baton Rouge.

MAINE

Pierce, Leonard A., 465 Congress St., Portland 3.
Scribner, Fred C., Jr., 456 Congress St., Portland 3.

MARYLAND

Alexander, William H., 3210 Auchentoroly Ter., Baltimore 17.
Asch, Jerome M., 10 E. Fayette St., Baltimore.

MARYLAND—Cont'd

Batrus, Frederick E., 7124 Fairfax Road, Bethesda.
Boyce, William G., Jr., 1520 Fidelity Bldg., Baltimore 1.
Brown-Groover, Mary Agnes, 3809 Blaine Drive, Chevy Chase 15.
Brune, Frederick W., 620 Court House, Baltimore 2.
Campbell, John A., 5600 Cedar Parkway, Chevy Chase 15.
Cohen, Sherman S., 9508 E. Bexhill Drive, Kensington.
Colodny, Edwin I., 10003 Portland Road, Silver Spring.
Creighton, T. H., Jr., 6704 Maple Ave., Chevy Chase 15.
Cutler, Lloyd N., 5215 Chamberlin Ave., Chevy Chase.
Dahan, George A., 6537 Elgin Lane, Bethesda 14.
Donadio, Anthony P., 301 B & O Bldg., Baltimore 1.
Eisenberg, Milton, 6319 Tone Court, Bethesda 14.
Eisenhauer, Emilie, 5017 Battery Lane, Bethesda 14.
Elward, Miss Elizabeth, 6102 Kirby Road, Bethesda 14.
Epstein, Simon Robert, 10612 Lockridge Dr., Silver Spring.
Feinblatt, Eugene M., 1400 American Bldg., Baltimore 2.
Fitts, Nathan Cheney, 6305 Winston Drive, Bethesda 14.
Fitzgerald, John L., 4109 Dewmar Court, Kensington.
Gillan, Charles McD., 22 Light St., Rm. 302, Baltimore 2.
Goldman, Max M., 6211 Bannockburn Dr., Bethesda 14.
Gormley, Robert Clark, 312 Bradley Ave., Rockville.
Haile, Walter R., 17 Reckord Bldg., Towson 4.
Harrington, John C., 103 Lynmoor Drive, Silver Spring.
Haycraft, Everett F., 218 Brewster Ave., Silver Spring.
Henry, Charles J. Jr., 301 Balt. & Ohio Bldg., Baltimore 1.
Ihrig, Edwin C., 4416 Ridge St., Chevy Chase 15.
Jaffee, Irving, 9105 Levelle Drive, Chevy Chase, 15.
Jones, Robert Franklin, R. R. 1 Norwood Rd., Silver Spring.
Kaufman, Frank Albert, 1508 1st Nat'l. Bk. Bl. Baltimore 2.
King, Henry T., Jr., 7812 Old Chester Rd., Bethesda.
Kingsley, Thomas R., 10614 Amherst Ave., Silver Spring.
Kratz, Kent P., 3115 63rd Place, Cheverly.
Kunen, James Lincoln, 3712 Bradley Lane, Chevy Chase 15.
Kurzius, Edwin L., 11513 Highview Ave., Silver Spring.
Lewin, John Henry, 1409 Mercante Tr. Bl., Baltimore 2.
Littman, Simon, 7206 Central Ave., Takoma Park 12.

MARYLAND—Cont'd

Lothschuetz, John M., 10609 Shady Circle, Silver Spring.
Lyle, Jerome Kenneth, 6603 Wells Parkway, Hyattsville.
Mahin, Mason John, 9201 Shelton St., Bethesda 14.
Marbury, William L., 900 1st Nat'l. Bank Bldg., Baltimore 2.
Marsh, Edward B., 5419 Goldsboro Rd., Bethesda 14.
McConnaughey, Robert K., 5220 Parkway Drive, Chevy Chase 15.
Meade, Cdr. Arthur Chew, 1505 Upshire Road, Baltimore 18.
Mesirow, Harold E., 4740 Bradley Blvd., Chevy Chase 15.
Moore, Jack Martin, 414 Hillsboro Drive, Silver Spring.
Moran, Wm. Donald, 4302 Fordham Road, Baltimore 29.
Morgan, Gerald D., R. F. D. #3, Gaithersburg.
Nystrom, Harold C., 9020 Old Georgetown, Bethesda 14.
O'Conor, Herbert R., Jr., 10 Light St., Baltimore 2.
Papps, Plato Ernest, 7708 Radnor Rd., Bethesda 14.
Ramsey, Alfred P., 1707 Lexington Bldg., Baltimore 1.
Redding, Robert E., 415 Eig Building, Silver Spring.
Reiblich, Prof. G. K., 6311 Boxwood Rd., Baltimore 12.
Sahm, Henry S., 8105 Eastern Ave., Silver Spring.
Sanders, William E., 10706 Lombardy Rd., Silver Spring.
Sass, Frederick, Jr., 4213 Leland St., Chevy Chase 15.
Scharnikow, William F., 6712 44th Ave., University Pk.
Shields, Robert H., 9523 Stanhope Rd., Kensington.
Sigmon, Richard R., 6805 Riggs Manor Drive, Hyattsville.
Smith, Charles W., 1810 Park Ave., Baltimore 27.
Sourwine, Julien G., 8917 Fairview Rd., Silver Spring.
Stansbury, Thomas A., APL-Johns Hopkins University, Silver Spring.
Steele, Charles J., 4531 Everett St., Kensington.
Stevenson, William B., 3415 Perry St., Mt. Rainier.
Stinchcomb, Charles J., 534 Equitable Bldg., Baltimore 2.
Tait, Edward T., 8615 Lynbrook Drive, Bethesda 14.
Taylor, Bg. Gen. John Thomas, 7006 Meadow Lane, Chevy Chase.
Tocker, Herman, 2712 Navarre St., Chevy Chase.
Unkenholz, Willard C., 11125 Easecrest Drive, Silver Spring
Wald, Robert Lewis 107 Quincy St. Chevy Chase 15.
Walsh, William C., Liberty Trust Bldg., Cumberland.
Wickline, Harry F., 7812 Takoma Ave., Takoma Park 12.

MARYLAND—Cont'd

Wiser, Ralph L., 3509 Shepherd St., Chevy Chase.
Wolfsohn, Joel D., 3311 Turner Lane, Chevy Chase 15.
Zwerdling, Joseph, 401 E. Wayne Ave., Silver Spring.

MASSACHUSETTS

Austin, Robert W., Harvard Business CS, Boston 63.
Barrett, Francis E., Jr., 7 Water St., Boston 9.
Breslau, Maxwell, 191 Valentine St., West Newton 65.
Carpenter, Clair F., 628 Pleasant St., New Bedford.
Casson, Abraham B., 11 Beacon St., Boston 8.
Cohen, David J., 1 State St., Boston 9.
Coolidge, Charles A., Jr., 50 Federal St., Boston 10.
Cowin, Phillip, 85 Devonshire St., Boston.
Cross, Claude B., 829 Tremont Bldg., Boston.
Donahue, Malcolm M., 215 Barristers Hall, Boston 8.
Dunn, Richard B., 441 Stuart St., Boston 16.
Fisher, Lawrence H., 332 Main St., Worcester 8.
Hall, Reuben, 75 Federal St., Boston 10.
Harkins, Thomas I., 47 Smith Road, Hingham.
Haussermann, O. W., 15 State St., Boston.
Hopkins Robert H., 82 Devonshire St., Boston 9.
Jackson, Richard, 150 Causeway St., Boston.
Jaffe, Louis L. Harvard Law School, Cambridge 38.
Kruger, Joseph, 1 State St., Boston 9.
Marshall, Arthur M., 145 State St., Springfield 3.
Michaels, George, 75 State St., Boston 9.
Morgan, John W., 1004 Oliver Bldg., Boston 9.
Newhall, Charles B., 75 Federal St., Boston 10.
Piemonte, Gabriel F., 213 Hanover St., Boston 13.
Proctor, Charles W., 390 Main St., Worcester.
Proctor, Edward Otis, 294 Washington St., Boston 8.
Segal, Robert M., 11 Beacon St., Boston 8.
Tobias, Paul H., 44 School St., Boston 8.
Walsh, Gerald P., 1st Nat'l. Bank Bldg., New Bedford.
Welts, Harry M., 30 McKinnon Ave., Milton 86.

MICHIGAN

Andrews, Steven N., 105 W. Savannah, Detroit 3.
Bachman, Milton E., 306 Townsend St., Lansing 23.
Brady, Edmund M., 2150 Guardian Bldg., Detroit 26.
Brunson, Allen A., 321 Moross Rd., Grosse Pte. Frms.
Cleary, Owen J., 302 W. Michigan, Ypsilanti.
Clinard, William F., 1100 Griswold Bldg., Detroit.
Cooper, Frank E., 1100 Ford Bldg., Detroit 26.
Danhof, John J., 19381 Stratford Rd., Detroit.
Davis, Paul S., 3600 Penobscot Bldg., Detroit 26.
Falahee, James B., 212 W. Michigan Ave., Jackson.
Franklin, Leo I., 1100 Dime Bank Bldg., Detroit 26.

MICHIGAN—Cont'd

Fraser, Archie C., 1400 Mich. Nat'l. Tower, Lansing 8.
Frasik, Bernard S., 1405 W. Midland Road, Bay City.
Globensky, John L., P. O. Box 651, Benton Harbor.
Gossett, Wiliam T., The American Road, Dearborn.
Griffiths, Hon. Hicks G., 2128 National Bank Bldg., Detroit 26.
Hammond, J. T., 205-10 Gas Bldg., Benton Harbor.
Harding, William L., 35 Springview Dr., Apt. 204, Battle Creek.
Harrop, Leslie D., The Upjohn Co., Kalamazoo.
Hilder, Frazer F., 2682 Endsleigh Dr., Birmingham.
Hogan, Henry M., 3044 W. Grand Blvd., Detroit 2.
Hulbert, L. Gaylord, 3053 Penobscot Bldg., Detroit.
Kerr, A. Stewart, 1601 Dime Bldg., Detroit 26.
Lee, Hon. James H., 8 Hanover Road, Pleasant Ridge.
Lindemer, Lawrence B., 109 N. Clinton St., Stockbridge.
Long, Benjamin H., 4045 Penobscot Bldg., Detroit 26.
Matheson, Carney D., 2150 Guardian Bldg., Detroit 26.
McGregor, Kenneth D., Parke Davis & Co., Detroit 32.
Nelson, Grey K., 807 Mich. Centrl. Term., Detroit 26.
Parker, Hyman, 19505 Griggs, Detroit 21.
Scott, Miss Rosemary, 310 Bldg. & Loan Bldg., Grand Rapids 2.
Sobesky, John G., 7 141 Gen. Mtrs. Bldg., Detroit 2.
Sullivan, Robert A., 1800 Buhl Bldg., Detroit 26.
Taylor, Russell J., 600 Main St., St. Joseph.
Tryand, James P., 3050 Lonyo Road, Detroit 9.
Van Eenenaam, Gordon F., 868 Second St., Muskegon.
Wells, Joe R., 500 Griswold St., Rm. 1357, Detroit 26.
Wyatt, George H., 300 Mich. Cntrl. Ter., Detroit 16.

MINNESOTA

Bennett, Hon. L. Howard, 3700 3rd Ave., South, Minneapolis 9.
Clay, Charles H., 1427 1st Nat'l. Soo, Minneapolis.
Danforth, William B., 5200 Meadow Ridge, Minneapolis 24.
Dorsey, John G., 1300 1st Nat. Soo Bg., Minneapolis 2.
Essling, William, 730 Minn. Bldg., St. Paul.
Farley, John H., 620 Roanoke Bldg., Minneapolis 2.
Farnand, Patrick L., 410 Roanoke Bldg., Minneapolis 2.
Feinberg, Sidney S., 3700 Frances Ave., S. Minneapolis 16.
Felhaber, Richard S., E. 1407 Nat'l Bk. Bldg., St. Paul 1.
Flom, Gerald T., 1260 Northwestern Bank Bldg., Minneapolis 2.

MINNESOTA—Cont'd

Forster, Reginald B., 121 W. Franklin Ave., Minneapolis 4.
Hadlick, Elwin E., 846 Builders Exch. Bldg., Minneapolis 2.
Hanold, Terrance, 600 Pillsbury Bldg., Minneapolis 2.
Hart, B. C., W2162 1st Nat'l. Bank Bldg., St. Paul 1.
Hoag, Jay H., 807 1st Amer. Nat'l. Bk. Bldg., Duluth 2.
Jordan, Harold, E1006 1st Nat'l. Bank Bldg., St. Paul 1.
Larson, Richard S., 7600 Northwestern Bk. Bldg., Minneapolis 2.
Lindquist, Leonard E., 1010 Midland Bk. Bldg., Minneapolis 1.
Mac Iver, L. Dale, Aeron Holman Airprt, St. Paul.
McCabe, Thomas M., 701 Torrey Bldg., Duluth.
Moore, Clay R., 1100 1st Nat'l-Sooline Bl., Minneapolis 2.
Moore, Perry Randolph, 1100 1st Nat. Soo Line Bldg., Minneapolis 2.
Morken, Donald A., 1100 Soo Line Bldg., Minneapolis 2.
Nunneley, Emory T., Jr., Investors Service, Inc., Minneapolis 2.
Remele, A. C., 715 Grain Exchange, Minneapolis 15.
Richter, Charles H., P. O. Box 226, Saint Cloud.
Roberts, David R., 425 Portland Ave., Rm. 334, Minneapolis 15.
Robertson, Donald L., 1260 Northwestern, Minneapolis 2.
Rosenbloom, Noah S., R. F. D. #1, Redwood Falls.
Rosenmeier, A. Gordon, Amer. Nat'l. Bk. Bldg., Little Falls.
Sanborn, Bruce W., 520 Endicott Bldg., St. Paul 1.
Smith, C. Paul, 490 N. Shelling Ave., St. Paul 4.
Soderberg, Harold J., State Capitol, St. Paul.

MISSISSIPPI

Anderson, John R., P. O. Box 301, Tupelo.
Barnett, Ross R., 414 E. Capitol St., Jackson.
Chadwick, Carl A., P. O. Box 225, Natchez.
Ford, Aaaron L., Plaza Bldg., Jackson.
Mitchel, Ben Ferrell, P. O. Box 552, Cleveland.
Provine, Leon Eggleston, Professional Bldg., Grenada.
Roberts, M. M., P. O. Box 870, Hattiesburg.
Thomas, Earl Tilman, P. O. Box 158, Jackson 5.
Tubb, T. J., Attorney at Law, West Point.
Ward, Thomas R., Rosenbaum Bldg., Meridian.
Watkins, Henry V., P. O. Box 427, Jackson 5.
Wells, Calvin B., Fry Bldg., Natchez.

MISSOURI

Ahmann, Hugo W., 4 N. Eight St., St. Louis 1.
Babler, Wayne E., 1010 Pine St., R2305, St. Louis 1.
Bailey, George E., 28 Middlesex Drive, St. Louis 17.
Baker, William Frazier, 310 E. 5th St., Fulton.
Bean, Bourne, 506 Olive St., St. Louis 1.

MISSOURI—Cont'd

Blanton, Harry C., 201 S. New Madrid, Sikeston.
Brewer, Oscar S., 1010 Ins. Exchge. Bldg., Kansas City 5.
Bundschu, Henry A., 1100 Columbia Bank Bldg., Kansas City 6.
Burridge, Robert G., 300 Frisco Bldg., St. Louis 1.
Clark, Walter M., 506 Olive St., St. Louis 1.
Clegg, Frank W., Box 1741 Plaza Station, St. Louis 99.
Connaghan, John D., 7 N. 7th, St. Louis 1.
Davis, Eugene S., 1667 Ry Exch. Bldg., St. Louis 1.
Doyle, Arthur J., 106 W. 14th St., Kansas City 5.
Duggan, Jerry T., 700 Scarritt Bldg., Kansas City 42.
Ellison, Myron K., 9 W. 10th St., Kansas City 5.
Francis, Marion S., Boatmans Bk. Bldg., St. Louis 2.
Freeman, Frankie Muse, 2031 Olive St., St. Louis.
Gage, John B., 1007 Bryant Bldg., Kansas City 6.
Gage, John C., 1007 Bryant Bldg., Kansas City 6.
Goebel, John J., 314 N. Broadway, St. Louis 2.
Goff, Leon W., 721 Pestalozzi St., St. Louis 18.
Grinnell, Ernest D., Jr., 300 Frisco Bldg., St. Louis 1.
Hillix, Albert F., 807 Bryant Bldg., Kansas City 6.
Hilpert, Elmer E., Wash. Un. Sch. of Law, St. Louis.
Homire, James L., 1025 Frisco Bldg., St. Louis 1.
Howard, Robert L., Univ. Mo., 20 Tate Hall, Columbia.
Hyde, Hon. Laurance M., Supreme Court Bldg., Jefferson City.
Hyde, Laurance M., Jr., St. Louis S. F. Ry., St. Louis.
Kemp, William E., 810 Commerce Bldg., Kansas City.
Kirwan, F. Philip, 1300 R. A. Long Bldg., Kansas City 6.
Koontz, Paul G., 810 Commerce Bldg., Kansas City 6.
Kranitz, Louis, 714 Francis St., St. Joseph 7.
Kretsinger, Tom B., 1014-18 Temple Bldg., Kansas City 6.
Limbaugh, Rush H., Jr., 102 N. Main St., Cape Girardeau.
McCullough, John E., 300 Frisco Bldg., St. Louis 1.
Meyer, Stuart F., 721 Pestalozzi St., St. Louis 18.
Moore, Frank H., 4619 Jefferson, Kansas City.
Mueller, F. W., 408 Olive St., St. Louis 2.
Murphy, Stephen P., 410 W. 47th St., Kansas City 13.
Poole, Lloyd G., 1603B Jefferson Hts., Jefferson City.
Roach, Davis Millard, 1006 Grand Ave., Kansas City 6.
Rogers, Edmund C., 312 Guild Bldg., Clayton.
Rogers, Randolph P., Jr., 1701 Bryant Bldg., Kansas City.
Rutledge, Thomas G., P. O. Box 516, St. Louis 66.

MISSOURI—Cont'd

Shewmaker, Richard D., 705 Olive St., St. Louis 1.
Silver, Marvin Q., 722 Chestnut St., Rm. 601, St. Louis 1.
Stewart, Maurice L., 1273 Arcade Bldg., St. Louis 1.
Stockman, John R., Railway Exchange Bl., St. Louis 1.
Sullivan, Daniel J., 611 Olive St., Rm. 1555, St. Louis 1.
Tabor, John Thompson, 1300 Delmar Blvd., St. Louis 3.
Teasdale, Kenneth, 506 Olive St., 15th Fl., St. Louis 1.
Vaughan, J. Terrell, 506 Olive St., 15th Fl., St. Iouis 1.
Watson, Edwin Massey, 203 Guitar Bldg., Columbia.

MONTANA

Angland, Emmett C., 521 Ford Bldg., Great Falls.
Aronow, Cedor B., 153 Main St., Shelby.
Hanson, Norman, P. O. Box 2529, Billings.

NEBRASKA

Doyle, James A., Creighton Univ. of Law, Omaha 31.
Fraizer, C. C. 312 Lincoln Life Bldg., Lincoln 8.
Harding, J. Max, 605 S 12th St., Lincoln 8.
Huber, Walter G., P. O. Box 530, Blair.
Kuhns, Barton H., 805 1st Nat'l. Bk. Bldg., Omaha 2.
Peycke, Tracy J., 637 Omaha Nat'l. Bank Bldg., Omaha 2.
Poley, Harris A., 100 S. 19th St., Omaha 2.
Roach, F. Vinson, 2223 Dodge St., Omaha 1.
Shrout, Clayton H., 1004 City Nat. Bk. Bldg., Omaha.
Stern, Donald L., 924 City National Bank Bldg., Omaha 2.
Svoboda, R. E., 1502 City Nat'l. Bk. Bldg., Omaha 2.

NEVADA

Anglim, Morgan, P. O. Box 249, Reno.
Blakey, Richard W., P. O. Box 2311, Reno.
Chrislaw, John L., 555 S. Center St., Reno.
Folsom, George, 150 N. Center St., Reno.

NEW HAMPSHIRE

Devine, Maurice F., 1838 Elm St., Manchester.
Snow, Brig. Gen. Conrad E., R. F. D. 1 Box 79, Gilmanton Iron.
Upton, Robert W., Concord.

NEW JERSEY

Autenrieth, Joseph F., 501 Grand Ave., Asbury Park.
Bartenstein, Fred, Jr., Merck & Company, Inc., Rahway.
Biunno, Joseph J., 605 Broad St., Newark 2.
Blake, William H., 89 Park Place, Newark 1.
Boylan, Matthew P., 210 S. Burnet, East Orange.

NEW JERSEY—Cont'd

Cohen, Louis J., 744 Broad St., Newark.
Cooke, Thomas Turner, 71 MacCulloch, Morristown.
D'Agostino, Amerigo, 1060 Broad St., Newark 2.
Davis, Joseph Anthony, 1 Exchange Place, Jersey City 2.
Flynn, Bernard F., Jr., 1060 Broad St., Newark 2.
Fredericks, Murray, 504 Schwehm Bldg., Atlantic City.
Gallagher, Henry M., Jr., 13 Woodstone Road, Basking Ridge.
Goodman, Samuel M., 1060 Broad St., Newark 2.
Haines, Martin L., 200 High St., Mt. Holly.
Hannoch, Herbert J., 17 Academy St., Newark.
Hardin, John R., Jr., 500 Broad St., Newark.
Harrison, Joseph, 744 Broad St., Newark 2.
Hendrickson, Robert C., 21 Cooper St., Woodbury.
Kean, Hamilton Fish, 744 Broad St., Newark 2.
Kirkman, Elwood F., Boardwalk Nat'l. Bldg., Atlantic City.
Klinger, Allan H., 40 Journal Square, Jersey City 6.
Labrecque, Theodore J., 18 Wallace St., Red Bank.
McKenna, Jerome B., 6 Stanworth Lane, Princeton.
McNulty, Thomas, 40 Journal Square, Jersey City 6.
Milmed, Leon S., 111 Farley Rd., Short Hills.
O'Brien, James F. X., 17 Academy St., Newark 2.
Patten, Edward J., 313 State St., Perth Amboy.
Pinsky, David E., 406 Penn St., Rutgers Univ., Camden 2.
Plone, Albert K., 511 Market St., Camden 2.
Rothbard, Samuel L., 744 Broad St., Newark 2.
Rubenstein, J. Mortimer, 45 Church St., Paterson 1.
Sailer, John R., 47 W Grand St., Elizabeth.
Schiff, Norman N., 744 Broad St., Newark 2.
Smith, Sylvester C., Jr., 18 Bank St., Newark 2.
Tepper, Jules E., 1060 Broad St., Newark 2.
Ward, Waldron M., 500 Broad St., Newark 2.
Watson, Russell E., 390 George St., New Brunswick.
Weckstein, Herman B. J., 1060 Broad St., Newark 2.
Wegner, Hon. John C., 225 Derrom Ave., Paterson.
Wilentz, Hon. T. David., 117 Smith St., Perth Amboy.
Zerman, Samuel William, 4100 Park Ave., Weehawken.

NEW MEXICO

Girand, W. D., P. O. Box 1445, Hobbs.
Hackney, John K., 142 Truman, N. E. Albuquerque.
Michael, Kaiser, Jr., 911 Richmond Drive, S. E., Albuquerque.
Poole, Rufus, G., 715 Simms Bldg., Albuquerque.
Radosevich, Georgina, 1021 LaCasita Orchard Pl., N. W., Albuquerque.
Siegenthaler, William M., P. O. Box 338, Artesia.

NEW YORK

Almirall, Lloyd V., 15 Broad St., New York 5.
Anderson, Francis H., Albany Law School, Albany 8.
Anderson, Lloyd C., P. O. Box 590, Binghamton.
Anderson, Roy M., P. O. Box 731, Rye.
Angiolillo, Joseph, 25 Bergen St., Brooklyn 1.
Atkin, Irving Michael, 420 Lexington Ave., New York 17.
Awtry, Col. J. H., USAR Ret., 9 Stonehouse Rd., Scarsdale.
Bailey, Parker, 15 Broad St., New York 5.
Barnes, Albert Macc, 25 Broadway, New York 4.
Baron, George C., 30 Broad St., New York 4.
Barry, John J., 1 Hunter St., Long Island City 1.
Bass, Milton A., 342 Madison Ave., New York 17.
Bates, G. Wallace, 140 West St., Rm. 2800, New York 7.
Bell, Robert C., Jr., 521 Fifth Ave., New York 17.
Benjamin, Robert M., 1 E. 44th St., New York 17.
Berger, Albert, 87-30 204th St., Hollis 23.
Berlack, Harris, 20 Exchange Pl., New York 5.
Berman, Alfred, 30 Pine St., New York 5.
Berman, David T., 26 Court St., Brooklyn 2.
Bernstein, Hilliard L., 165 Broadway, New York 6.
Bouck, Warner M., 107 Columbia St., Albany 7.
Bradford, Raymond H., 338 Broadway, Newburgh.
Brauner, Herman M., 120 Broadway, New York 5.
Brauner, Julius F., 485 Madison Ave., New York 22.
Brick, Francis A., Jr., 2 Wall St., New York 5.
Brodsky, David, 71 Minerva Dr., Tuckahoe, N. Y.
Brodsky, Samuel, 551 Knickerbocker, Brooklyn 21.
Brokaw, Clifford V., III, 14 Wall St., New York 5.
Brooks, Robert D., Rm. 1566, 466 Lexington Ave., New York 17.
Browde, Leonard, 250 Hudson St., New York 13.
Burstein, Herbert, 160 Broadway, New York 38.
Cameron, L. Orville, 10 Rockefeller Plaza, New York 20.
Carroll, James E., 15 Broad St., New York 5.
Carroll, John B., 305 Larner Bldg., Syracuse 2.
Carrow, Milton M., 230 Park Ave., New York 17.
Cassidy, Adrian C., 195 Broadway, New York 7.
Castaldi, Michael A., 500 Fifth Ave., New York 36.
Chanler, William C., 40 Wall St., New York 5.
Chattaway, Charles W., 60 E. 42nd St., Rm. 2520 New York 17.
Chess, Maurice, 21 Fern St., New Rochelle.
Chopnick, Max, 9 E. 46th St., New York 17.
Christiansen, Robert, 71 S. Bay Ave., Brightwaters, L. I.
Clare, William F., Jr., 44 Wall St., New York 5.
Cohen, David Q., 60 John St., New York 38.
Cohen, Harold J., 195 Broadway, New York 7.
Cohen, William I., 11 Park Place, New York 7.

NEW YORK—Cont'd

Cohn, Herbert B., 30 Church St., New York 8
Colburn, J. Bradley, 25 Broadway, New York 4.
Colgren, John Harold, 466 Lexington Ave., New York 17.
Colton, David J., 120 Broadway, New York 5.
Cooper, C. William, 30 Rockefeller Pz. Rm. 3000, New York 20.
Cornyn, Frank P., 95 McDougal St., Brooklyn 33.
Covington, Hayden C., 124 Columbia Hghts., Brooklyn 2.
Crabill, Frank W., 40 Wall St., New York 5.
Crouse, Cecil I., 350 Madison Ave., New York.
Cummings, G. Clark, 120 Broadway, Rm. 2921, New York 5.
Currie, Francis, 40 Wall St., New York.
Cusumano, Gaspare M., 44 Whitehall St., New York 4.
Davis, Richard T., 165 Broadway, New York 6.
Davis, William H., 30 Broad St., New York 4.
Deming, Leslie H., 1000 State Tower Bldg., Syracuse.
Dicke, Richard Maclane, 120 Broadway R. 3250, New York 5.
Dohl, Paul R., Eaton Ave., Norwich.
Donlon, Hon. Mary H., 201 Varick St., New York 14.
Dowling, William F., Jr., 151 Penna Ave., Tuckahoe.
Doyle, John C., 16 Court St., Rm. 3505, Brooklyn 2.
Dubroff, Edward L., 50 Court St., Brooklyn 2.
Duncan, John V., 1 Wall St., New York 5.
Dunn, Stannard, 25 Broadway, New York.
Edelman, Joshua, 239 Broadway, New York.
Eder, George J., 67 Broad St., New York 4.
Ehrhardt, Laurence C., 155 E. 44th St., New York 17.
Elliott, Shelden D., 40 Washington Sq. S., New York.
Elsinger, Erwin J., 1535 Undercliff Ave., New York 53.
Engelson, David M., 347 5th Ave., New York 16.
Ennis, Edward J., 165 Broadway, New York 6.
Ettinger, Harry L., 271 Madison Ave., New York 16.
Feldman, Justin N., 415 Madison Ave., New York 17.
Ferguson, John J., 420 Lexington Ave., New York 17.
Fernicola, Anthony J., 1509 1st Nat'l. Bank Bldg., Utica.
Ferster, Herbert, 15 E. 26th St., Rm. 1504, New York 10.
Fields, Bert M., 2126 Benson Ave., Brooklyn 14.
Fier, Charles H., 26 Court St., Brooklyn 2.
Finger, Justin J., 271 Avenue C., New York 9.
Fischer, Samuel, 545 5th Ave., New York 17.
Fletcher, Stephen H., 195 Broadway, Rm. 2530, New York 7.
Ford, Sumner, 15 Broad St., New York.
Fowler, James A., Jr., 63 Wall St., New York 5.
Fried, Elmer, 37 Wall St., New York 5.
Friedgen, Herbert G., 271 Madison Ave., New York 16.
Fuller, Wm. E., 120 Broadway, New York 5.
Gaffney, Warren N., 60 John St., New York 38.
Gallagher, Harold J. 15 Broad St., New York 5.

NEW YORK—Cont'd

Gannon, Miss Lucille M., 2 Rector St., New York 6.
Gardner, Richard Newton, Columbia Univ. Law School, New York 27.
George, George E., 30 Broad St., New York 4.
Gerber, Bertrand D., 119 W. 57th St., New York.
Giardino, Alfred, 165 Broadway, New York.
Gilbert, Albert M., 1 E. 44th St., New York 17.
Glines, Kenneth W., 10 Lowell Place, Fredonia.
Golub, William W., 3 E. 54th St., New York 22.
Goodman, Jack, 90 State St., Albany.
Goodstein, George, 369 Lexington Ave., New York 17.
Gordon, Herbert B., 545 Broadway, Albany 7.
Gordon, Leonard, 1127 Harris St., Far Rockaway 91.
Gore, Sanford L., 6837 Harrow St., Forest Hills 75.
Gough, James Rowland, 501 W. 133rd, Apt. M E., New York 27.
Greenman, Frederick F., 20 Pine St., New York.
Greenman, Steve, 52-06 Bowne St., Flushing 55.
Grenier, Edward J., 545 Fifth Ave., New York 17.
Gross, Albert M., 75 Pk. Terrace, E., New York 34
Grossman, Harry, 545 Fifth Ave., New York. 17.
Hale, Hamilton O., 122 E. 42nd St., New York 17.
Halpern, Alexander, 342 Madison Ave., New York 17.
Halpern, Philip, Erie County Hall, Buffalo 2.
Handler, Milton, 425 Park Ave., New York 22.
Harper, Harold, 70 Pine St., New York.
Haynes, Robert B., 25 Broadway, Rm. 853, New York.
Heggy, Donald R., 350 Madison, Rm. 501, New York 17.
Heiges, Jesse G., 11 Bartlett St., Brooklyn 6.
Hendrickson, F. R., 116 Carol Ave., Rd. 3 Vestal.
Herzog, Paul M., 477 Madison Ave., New York 22.
Hirshowitz, Samuel A., 80 Centre St., New York 13.
Hoffman, Malcolm A., 285 Madison Ave., New York 17.
Hoge, James F., 41 E. 42nd St., New York 17.
Horgan, Charles S., 111 Broadway, New York 6.
Hurlbert, Leroy H., 400 Erie Cty Bk. Bldg., Buffalo.
Isaacs, Myron S., 3 E. 54th St., New York 22.
James, Daniel, 63 Wall St., New York 5.
Jarvis, Robert B., 115 Broadway, New York 6.
Jones, Charles L., 2nd, 30 Rockefeller Plaz., New York 20.
Jones, Robert H., III, 90 State St., Albany 7.
Jones, Tilford A., 120 E. 41st St., New York 17.
Joyce, William R., Jr., 15 Broad St., New York 5.
Joyner, Quintard, 120 Wall St., New York 5.

NEW YORK—Cont'd

Judd, Orrin G., 655 Madison Ave., New York 21.
Kadane, David K., 73 Porterfield Pl., Freeport, L. I.
Kaminsky, Michael, 122 E. 42nd St., New York 17.
Kanter, Edward L., 250 Park Ave., New York 17.
Kaplan, Daniel Richard, 285 Madison Ave., New York 17.
Katcher, Monroe I., 2nd., 1501 Broadway, New York 36.
Kaufman, Abraham, 55 Liberty St., New York 5.
Kaufman, Joseph W., 511 Fifth Ave., New York 17.
Keisman, Eric Lawrence, 498 West End Ave., New York 24.
Kellick, William L., Jr., 770 Main St., Niagara Falls.
Kent, William J., Jr., 44 Court St., Brooklyn 1.
King, Archibald E., Jr., 11 Broadway, New York 4.
Kittelle, Sumner S., 15 Broad St., New York 5.
Kline, Joseph V., 20 Broad Street, New York 5.
Koenigsberg, Joshua S., 15 Park Row, New York 38.
Kostelanetz, Boris, 52 Wall St., New York 5.
Kulze, Richard, 70 Wall St., New York 5.
LaPorte, Cloyd, 40 Wall St., New York.
Laufer, Arthur M., 70 Pine St., New York 5.
Lazarus, Gustav, 25 Broad St., New York 4.
Leboeuf, Randall J., Jr., 15 Broad St., New York.
Lenley, Jay E., 375 Park Ave., New York 22.
Lent, Frank B., 100 Park Ave., New York 17.
Leon, Edward J., 9 E. 40th St., New York 16.
Levin, Milton M., 521 Fifth Ave., New York 17.
Levine, Joshua, 1 E. 44th St., New York 17.
Lukingbeal, Kent V., 40 Wall St., New York 5.
Lyon, Charles S., 70 E. 90th St., New York 28.
Maddy, Elmer C., 120 Broadway, New York 5.
Mahoney, John Regan, 26 Broadway, New York 4.
Malino, Jerome E., 10 E. 40th St., New York 16.
Maltinsky, Herbert L., 185 Montague St., Brooklyn 1.
Mangano, Benedict T., 112 State, Albany.
Markoff, Abraham, 401 Broadway, New York 13.
McAlevey, John F., Eagle Valley Road, Sloatsburg.
McAllister, Breck P., 2 Wall St., New York 5.
McCain, Samuel Adams, 17 Battery Place, New York 4.
McCarthy, Matthew E., 29 Broadway, Rm. 2800, New York 6.
McFadden, Thomas J., 2 Wall St., New York 5.
McGoldrick, James G., 11 Broadway, New York 4.
McInerny, Gilbert S., 22 E. 40th St., New York 16.
McKenna, Thomas J., 39 Broadway, New York 6.
McLean, Roger T., 115 Broadway, New York 6.
Meighan, Burton C., 60 E. 42nd St., New York 17.
Menagh, Donald F., 32 E. 39th St., New York 16.

NEW YORK—Cont'd

Meyer, Bernard S., 298 Linwood Ave., Cedarhurst.
Mezansky, Samuel, 350 Fifth Ave., New York 1.
Miles, William M., 166 W. 120th St., New York 27.
Miller, Murray A., 1619 Broadway, New York 19.
Miller, Paul Duryea, 20 Broad St., New York 5.
Millonzi, Robert I., 438 Main St., Buffalo 2.
Minor, Robert W., 466 Lexington Ave., N.Y.C. R. R., New York 17.
Mollison, Hon. Irvin C., 201 Varick St., New York 14.
Monahan, Roy P., 37 Wall St., New York 3.
Montague, Gilbert H., 67 Wall St., New York 5.
Moore, William J., 100 Park Ave., New York 17.
Moss, William C., 3427 Bedford Ave., Brooklyn 10.
Nash, Simon J., 249 Norwood Ave., Buffalo 22.
Naylon, Edmund B., 61 Broadway, New York.
Nebolsine, George, 488 Madison Ave., New York 22.
Neuberger, Paul, 16 W. 46th St., New York 36.
Oberst, Paul, New York Univ. Schl. of Law, New York 3.
O'Brien, Matthew H., 350 Fifth Ave., New York 1.
Ohlbaum, Stanley N., 42 Broadway, Rm. 1200, New York 4.
O'Malley, James Jr., 15 Broad St., New York 5.
Otterbourg, Edwin M., 200 Fifth Ave., New York 10.
Palmer, Arthur E., Jr., 40 Wall St., New York 5.
Palmer, William P., 40 Wall St., New York 5.
Pearis, Samuel H., 703 Press Bldg., Binghamton.
Peck, Hon. David W., 48 Wall St., New York 5.
Penney, Thomas, 1550 Rand Bldg., Buffalo.
Pepper, Morton, 1807 55 Liberty St., New York 5.
Pinney, Edward S., 15 Broad St., New York 5.
Pirie, John C., 135 E. 42nd St., New York.
Polikoff, Harry, 76 Beaver St., New York 5.
Poth, Harry A., Jr., Two Rector St., New York 6.
Rabb, Maxwell M., 61 Broadway, New York 6.
Rains, Harry H., Denton Bldg., Mineola.
Raphael, Sidney O., 18 E. 41st St., New York 17.
Ray, George W., Jr., 505 Park Ave., New York 22.
Ray, John H., 57 Bay St., Staten Island 1.
Ray, Kenneth B., 161 3 42nd St., New York 17.
Raybin, George Nims, State Rent Commission, 280 Broadway, New York 17.
Re, Prof. Edward D., 223 Bay Ridge Pkwy., Brooklyn 9.
Reeves, William Harvey, 20 Exchange Place, New York 5.
Reeder, Spencer W., 6023 University Pl., New York 3
Rode, John D., 342 Madison Ave., New York 17.
Rowe, Samuel, 47 Featherbed Lane, Bronx 52.
Ruben, Robert J., 41 E. 42nd St., New York 17.
Rutenberg, John W. M., 233 Broadway, Rm. 3811, New York 7.

NEW YORK—Cont'd

Ryan, Mark J., 60 E. 42nd St., New York 17.
Sadtler, H. Plitt, Jr., 1230 6th Ave., Rock. Cntr., New York 20.
Salzman, Sidney J., 214 Times Square Bldg., Rochester 14.
Savell, Irving, 115 Broad St., New York 4.
Sawyer, Albert Ernest, 84 William St., 17 Fl., New York 38.
Schoonmaker, George B., 4931 30 Rockefeller, New York 20.
Schwartz, Bernard, 60 Sutton Place South, New York 22.
Schwartz, Mrs. Aileen H., 60 Sutton Place South, New York 22.
Shapiro, David I., 350 5th Ave., New York 1.
Shattuck, Edwin P., 42 Broadway, New York.
Shepard, Charles, 45 Exchange St., Rochester 14.
Shertzer, George E., 730 Third Ave., New York 17.
Shivitz, David I., 160 N. Broadway, Nyack.
Silliere, Edward A., 14 Wall St., New York 5.
Silverman, David B., 355 Lexington Ave., New York 17.
Siragusa, Angelo G., 64-96 84th Place, Forest Hills W. 79.
Slate, John H., 551 Fifth Ave., New York 17.
Sovik, Laurence, 300 Wilson Bldg., Syracuse.
Spalding, H. Boardman, 55 Liberty St., New York 5.
Spater, George A., 100 Park Ave., A A, New York 17.
Stentzel, Lawrence L., II, 122 E. 42nd St., New York 17.
St. John, Edward S., 1 Eastern Crest Rd., Port Washington, L. I.
Stockman, Abram H., 36 W. 44th St., 813, New York 36.
Stone, Oliver L., 3950 R. C. A. Bldg., New York 20.
Swatland, Donald C., 15 Broad St., New York 5.
Tannenbaum, Nathan, 535 Fifth Ave., New York 17.
Teller, Ludwig, 295 Madison Ave., New York.
Tenney, John Wool G., 40 Wall St., New York 5.
Thom, James Dale, The Cragswold, Scarsdale.
Throop, Allen E., 20 Exchange Place, New York 5.
Tilden, Richard A., 441 Lexington Ave., New York 22.
Tischler, Louis Norman, 1205 College Ave., Bronx 56.
Titus, Harvey L., 420 Lexington Ave., New York 17.
Toch, Ruth Kessler, Department of Law, Albany.
Trask, Benjamin H., P. O. Box 1281, New York 17.
Tsoucalas, Nicholas, 170 Broadway, New York 38.
Tuttle, Charles H., 15 Broad St., New York 5.
Tweed, Harrison, 15 Broad St., New York 5.
Twombly, Edward B., 165 Broadway, New York 6.
Vogel, Harold, 161 E. 42nd St., New York 17.
Van Voorhies, M., 20 Exchange Place, New York 5.
Wasserman, Herbert, 375 Park Ave., New York 22.
Wegman, J. Bertram, 60 Wall St., New York 5.

NEW YORK—Cont'd

Weiden, Paul, 61 Broadway, New York 6.
Weil, Gilbert H., 60 E. 42nd St., New York 17.
Weisl, Edwin L., Jr., 120 Broadway, New York 5.
Weiss, Bernard, 136 E. 57th St., New York.
Wels, Richard H., 341 Madison Ave., New York 17.
Whipple, Taggart, 15 Broad St., New York 5.
Whiteside, George W., 25 Broadway, New York 4.
Wikler, Julius S., 50 Broad St., New York 4.
Wiles, Richard, 617 Wilson Bldg., Syracuse.
Williams, C. Dickerman, 76 Beaver St., New York 5.
Williams, Chauncey P., Jr., 15 Broad St., New York 5.
Wingebach, Arthur D., 250 North St., White Plains.
Withrow, James R., Jr., 2 Wall St., New York 5.
Wolder, Stanley, 521 5th Ave., New York 17.
Wynn, James O., 1 E. 44th St., New York 17.
Zartman, Leonard S., 31 Exchange St., Rochester 14.
Zuckerbrot, Frank, 8 W. 40th St., New York 18.
Zweibel, Morris, 12 E. 41st St., New York 17.

NORTH CAROLINA

Beverly, Phil C., F2 Oleander Ct. Apts., Wilmington.
Dolan, Thomas E., Box 5284, Asheville.
Dorey, Donald J., P. O. Box 239, Roxboro.
Frazier, Robert H., P. O. Box 97, Greensboro.
Jenkins, John R., Jr., Aulander.
McMillan, James B., 500 Wachovia Bldg., Charlotte 2.
Osborn, Prime F., Law Dept. A.C.L. R.R. Co., Wilmington.
Poisson, Louis J., Sr., 318 S. 3rd St., Wilmington.
Robbins, H. Haywood, 401 Addison Bldg., Charlotte 2.
Shaw, John D., 121 Hermitage Road, Charlotte 7.
Smaw, O. Meredith, 215 King St., New Bern.
Wells, David Emerson, 209 Brookwood Ave., Wilmington.
Worcester, Ben D., P. O. Box 4282, Charlotte 4.

NORTH DAKOTA

Hoadley, Arthur T., P. O. Box 924, Bismarck.
Jestrab, Frank F., P. O. Box 1343, Williston.
McCann, Paul J., 200 First Nat. Bk. Bldg., Bismarck.
Sperry, Floyd B., Hillcrest Acres, Bismarck.
Van Osdel, Franklin J., 502 1st Nat'l. Bank Bldg., Fargo.

OHIO

Adams, Harold F., 3131 W. Broad St., Columbus 4.
Agee, Kenneth, 50 W. Broad St., Columbus 15.
Bailey, William E., 428 1st Nat. Bk. Bldg., Springfield.
Bloomenthal, Lawrence R., 808 Leader Bldg., Cleveland 14.

OHIO—Cont'd

Bretherton, Thomas S., 3155 River Road, Toledo 14.
Browne, Bitner, 203 1st Nat'l. Bk. Bld., Springfield.
Burgess, Roger H., 900 Union Comm. Bldg., Cleveland 14.
Burneson, Taylor C., 50 W. Broad St., Rm. 3040, Columbus 15.
Caren, John M., 50 W. Broad St., Columbus 15.
Carson, Henderson H., 600 1st National Bk. Bldg., Canton 2.
Clarke, Owen, 3500 Terminal Tower C. & C., Cleveland 1.
Collins, Laurence E., Fidelity Svgs. Bldg., Cincinnati 12.
Corrigan, William J., 620 Williamson Bldg., Cleveland 14.
Crabbe, J. Roth, 8 E. Broad St., Columbus 15.
Culp, Maurice S., Western Reserve Uni., Cleveland 6.
Davenport, Mrs. M. Jo, 417 S. Ashburton Ave., Columbus 13.
Dunbar, Frank C., Jr., 50 W. Gay St., Rm. 660, Columbus 15.
Emerson, Frank D., Univ. of Cinn. Law School, Cincinnati 21.
Fowler, William E., Jr., 1200 Mahoning Bank Bldg., Youngstown 3.
Gallagher, Francis J., 240 Huron St., Toledo 4.
Genovese, Ernest R., 1910 1st Nat'l. Tower, Akron 8.
Goldston, Eli, 800 Nat'l. City E6th Bldg., Cleveland 14.
Gorrell, James A., 52 East Gay St., Columbus 15.
Heidkamp, B. William, 412 Tri State Bldg., Cincinnati 2.
Jackson, Raymond T., 1956 Union Commerce Bldg., Cleveland 14.
Jones, John Robert, 50 W. Gay St., Columbus 15.
Kaps, Charles T., 50 W. Broad St., Columbus 15.
Kennedy, Philip J., 1812 Union Central, Cincinnati.
Kinder, George D., 1500 Midland Bldg., Cleveland 15.
Laird, W. Frederick, 99 N. Front St., Columbus 15.
Long, Bert H., 909 Atlas Bk. Bldg., Cincinnati.
Manley, James G., 1300 Fountain Sq. Bldg., Cincinnati 2.
Mason, Josiah Locke, 155 W. Main St., Ashland.
May, Charles H., Pythian Castle, Circleville.
McCray, Samuel A., Talbott Bldg., 3rd Fl., Dayton 2.
McGuire, Miss Catherine, 5308 N. High St., Columbus 14.
Mintz, Alexander, 16800 Kinsman Road, Shaker Hghts. 20.
Moor, John H., 1304 Toledo Trust, Toledo 4.
Nelson, L. Clair, Champion Paper Co., Hamilton.
Orn, Clayton L., 539 S. Main St., Findlay.
Pappas, Harry J., 361 Probasco Ave., Cincinnati 20.
Peterson, Ivar H., 1015 Vine St., Rm. 706, Cincinnati 2.

OHIO—Cont'd

Pitt, Frank R., 300 Phillips Ave., Toledo 1.
Pomaranski, Val, 3912 E. 131st St., Cleveland 5.
Porter, Howard D., 4124 Floral Ave., Norwood 12.
Prentice, Miss Mary E., 33 N. High St., Rm., 819, Columbus 15.
Puchta, Charles G., Jr., 2300 Union Cent. Bldg., Cincinnati 2.
Quinn, William R., 1012 1st Nat'l. Bk. Bldg., Canton 2.
Reiners, Hon. Fred G., 1009 1st National Bk. Bldg., Cincinnati 2.
Rhodes, Irwin S., 1410 Union Cntrl. Bl., Cincinnati 2.
Rudey, Carl Joseph, 4030 Sampson St., Toledo 12.
Sanborn, Ralph W., 810 Hartman Bldg., Columbus 15.
Seasongood, Hon. Murray, 1616 Union Cntl. Bdg., Cincinnati 2.
Shocknessy, James W., 17 S. High St., Columbus.
Spear, George A., Jr., 2887 Attleboro Rd., Shaker Heights 20.
Speer, W. Ray, 150 E. Broad St., Columbus 15.
Steadman, Charles W., 1656 Union Comm. Bld., Cleveland 14.
Stern, Leonard J., 306 Huntington Bank Bldg., Columbus 15.
Thomas, Devereaux, 514 Eddy Road, Cleveland 8.
Thompson, C. Russell, 3530 Leveque Lin Tr., Columbus.
Topper, Isadore, 306 Huntington Bank Bldg., Columbus 15.
Totten, Walter C., 407 W. Lincoln Way, Minerva.
Troy, Orville A., 1406 Fntn Sq. Bldg., Cincinnati 2.
Wagner, Glen Wilbert, R. R. I, Box 226, Port Clinton.
Wall, Stuart S., P. O. Box 1765 C. S. Toledo 3.
Wanlass, Ralph Page, Champion Paper Co., Hamilton.
Williams, Curtis C., Jr., 1759 Union Com. Bldg., Cleveland.
Williams, George C., 1717 E. 9th St., Cleveland 14.
Winter, Ralph A., Box 87, Lodi.

OKLAHOMA

Andress, R. J., P. O. Box 1979, Tulsa 2.
Bicking, Lewis J., 712 Petroleum Bldg.,Tulsa 3.
Burke, J. L., P. O. Box 1979, Tulsa.
Carter, Frank, P. O. Box 487, Enid.
Delaney, W. A., Jr., P. O. Box 57, Ada.
Hall, Walter B., P. O. Box 1979, Tulsa 2.
Hodges, D. E., Phillips Petroleum Co., Bartlesville.
Hunt, Cecil L., P. O. Box 1979, Tulsa 2.
James, Robert T., P. O. Box 2040, Tulsa 2.
Johnson, Pat O., 624 N. E. Fifteenth, Oklahoma City 4.
Kesler, Frank, 4805 N. Pate St., Oklahoma City 7.
McInnis, Neill Pauls, 1205 Liberty Bank Bldg., Oklahoma City 2.

OKLAHOMA—Cont'd

Merrill, Maurice H., Univ. of Oklahoma, Norman.
Mosteller, L. Karlton, 2712 1st Nat'l Bldg., Oklahoma City 2.
Mount, Conrad C., P. O. Box 1995, Oklahoma City 1.
Quinlan, Wayne, P. O. Box 8653, Oklahoma City 14.
Rogers, John, P. O. Box 911, Tulsa 1.
Russell, Stuart H., 1418 Liberty Bank Bldg., Oklahoma City 2.
Shelton, Troy, Esq., P. O. Box 990 Oklahoma City 1.
Upsher, Sidney P., P. O. Box 2488, Oklahoma City.
Williams, T. Dwight, 2220 1st Nat. Bldg., Oklahoma City.
Winn, Perry Haskell, P. O. Box 10568, Oklahoma City 20.
Worrell, James O., 4632 E. 56th Court, Tulsa 5.

OREGON

Bullivant, R. R., 527 Pacific Bldg., Portland 4.
Davidson, C. Girard, 610 Equitable Bldg., Portland 4.
Day, Frank E., 1200 Wilcox Bldg., Portland 4.
Haley, George P., 615 24th St., Milwaukie.
Hill, John W., 1200 American Bk. Bldg., Portland 5.
Jens, Charles A., Willamette Univ. Coll. Law, Salem.
Jones, George A., 209 Masonic Bldg., Salem.
Kerr, Robert M., 811 Equitable Bldg., Portland 4.
Lewis, Harold A., Gallagher Bldg., Ontario.
Lubersky, W. F., 800 Pacific Bldg., Portland 4.
Maguire, Robert F., 723 Pittock Block, Portland 5.
Maxwell, Richard B., 1st Fed. Sav. & Loan, Klamath Falls.
Miller, Robert Stevens, 1200 American Bank Bldg., Portland 5.
Phillips, Clarence D., 807 Electric Bldg., Portland 5.
Rodgers, George L., Jr., 1400 Public Service Bldg., Portland 4.
Rossman, Hon. George, Supreme Ct. Bldg., Salem.
Smith, Allan A., 1504 Publ. Serv. Bldg., Portland.
Smith, Allan Hugh, 823 Iona Plaza, Portland 1.
Stoll, Norman A., 1111 Failing Bldg., Portland 4.
Swan, Charles W., P. O. Box 428, Vale.
Tatum, Lofton L., 1310 Yeon Bldg., Portland 4.
White, Thomas J., 1100 Jackson Tower, Portland.

PENNSYLVANIA

Alker, Harry J., Jr., 1505 Land Title, Philadelphia.
Appel, George F. Baer, 1100 Provident Bldg., Philadelphia 3.
Aurich, Alfred C., 12 S. 12th St., Philadelphia 7.
Bechman, Wm. G., 908 Peoples Bk. Bldg., Pittsburgh.

PENNSYLVANIA—Cont'd

Bell, James A., 2818 Grant Bldg., Pittsburgh 19.
Bellwoar, Harry J. J., Jr., 12 S. 12th, Rm. 2901, Philadelphia 7.
Blaxter, G. Harold, 1307 Oliver Bldg., Pittsburgh 22.
Bloom, Israel C., 200 Washington Tr., Washington.
Brodsky, Alexander, 616 Bankers Securities Bldg., Philadelphia 7.
Broeker, Bernard D., 701 E. 3rd St., Bethlehem.
Buchanan, John G., 1800 Oliver Bldg., Pittsburgh 22.
Butler, Vincent, 2661 Mosser St., Allentown.
Chait, Frederick, 400 N. Broad St., Philadelphia.
Chaitkin, Maurice, 1310 Commonwlth Bld., Pittsburgh.
Coughlin, R. Lawrence, 35 N. Franklin St., Wilkes Barre.
Davis, Edward, 215 S. Broad St., Philadelphia 7.
De Furia, Guy G., 410 Welsh St., Chester.
Demmler, Ralph H., P. O. Box 2009, Pittsburgh 30.
Douglass, Paul F., 1300 Old Guldh Road, Rosemont.
Duff, Clair V., 509 Union Trust Bldg., Pittsburgh.
Edelman, Paul D., 614 Washington St., Reading.
Eiseman, Jay H., 1424 Phila. Bk. Bldg., Philadelphia 7.
Elsbree, Wayland H., 1000 Land Title Bl., Philadelphia.
Eshelman, Joseph F., 1600 Three Penn Center, Philadelphia 2.
Feldman, Louis Geo., 1009 11 Markle Bk., Hazleton.
Fink, David, Coulter Bldg., Greensburg.
Finkelhor, Mrs. Marion K., 118 Hastings, Pittsburgh 6.
Fisher, Robert M., Svgs. & Trust C Bld., Indiana.
Forer, Morris L., Packard Bldg., Philadelphia 2.
Frank, Harry H., Commerce Bldg., Harrisburg.
Garbarino, Robert P., 1000 Chestnut St., Philadelphia 5.
Glock, Carl E., 747 Union Tr. Bldg., Pittsburgh 30.
Graf, Christian V., 407 North Front St., Harrisburg.
Graham, Mortimore E., 615 Masonic Bldg., Erie.
Gray, William A., 1601 Packard Bldg., Philadelphia 2.
Hackney, Henry E., 747 Union Trust Bld., Pittsburgh 19.
Hafer, George H., P. O. Box 26, Harrisburg.
Harzenstein, A. S., 354 2 Penn. Ctr. Plaza, Philadelphia 2.
Haskins, George L., 3400 Chestnut St., Philadelphia 4.
Hayes, Norman T., Jr., 2107 Fid. Phila. Bldg., Philadelphia 9.
Heard, John J., P. O. Box 2009, Pittsburgh 30.
Heilman, Harry A., Jr., Mellon Bank Bldg., Kittanning.

PENNSYLVANIA—Cont'd

Helmetag, Carl Jr., 1138 6 Penn Center Plaza, Philadelphia 4.
Hunter, Frank M., 11 S. Oliver St., Media.
Hyndman, Thomas M., 1010 Fid. Phila. Tr. Bg. Philadelphia 9.
Kephart, Hon. A. Evans, 1144 Fidelity Phila. Tr. Bldg., Philadelphia 9.
King, Dominic B., 525 William Penn Place, Pittsburgh 30.
Kleckner, Robert G., 1617 Hamilton St., Allentown.
Knox, William W., 23 W. Tenth St., Erie.
Koerber, Dwight L., 1011 Oliver Bldg., Pittsburgh 22.
Kraemer, Philip G., 221 N. Bent Road., Wyncote.
Levy, Herbert S., 33 N. Duke St., Lancaster.
Lockhart, George D., 1130 Oliver Bldg., Pittsburgh 22.
Lucas, Edwin A., 1830 Land Title Bldg., Philadelphia 10.
Lurz, Thomas A., 690 Tyson Ave., Ardsley.
MacIntosh, W. James, 2107 Fid. Phila. Tr., Philadelphia 9.
Markowitz, Lewis H., 141 E. Market St., York.
Marsh, James M., 1507 Packard Bldg., Philadelphia 2.
Martin, John B., 1617 Land Title Bld., Philadelphia.
Masino, Filindo B., 1420 Walnut St., Philadelphia 2.
Mather, E. Everett, Jr., 1835 Arch St., Philadelphia.
McCamey, Harold E., 1310 Grant Bldg., Pittsburgh 19.
McDevitt, Vincent P., 1000 Chestnut St., Philadephia 5.
McLaughlin, Edw. D., 10 E. Fifth St., Chester.
Miller, Samuel G., 1000 Chestnut St., Philadelphia 5.
Mindlin, Morris, 117 E. 3rd, Bethlehem.
Mulford, John, Philadelphia Nat'l. Bank Bldg., Philadelphia 7.
Newlin, John Wigton, 1400 North Ave., Tyrone.
Nurick, Gilbert, P. O. Box 432, Harrisburg.
Nutting, Charles B., One Gateway Center, Pittsburgh 22.
Orlow, Mrs. Lena L., 700 Bankers Security Bldg., Philadelphia 7.
Prizer, John Butler, 1138 Transprtn. Cntr., Philadelphia 4.
Rhodes, Hon. Chester H., Court House, Stroudsburg.
Ringold, Irwin, M., 1116 Berger Bldg., Pittsburgh 19.
Sarkis, Frederick D., 1144 Fid.. Phila. Trust Bldg., Philadelphia 9.
Sayers, James B., Two Gateway Ctr., Pittsburgh 22.
Schnader, Hon. William A., 1719 Packard Bldg., Philadelphia 2.
Schulz, W. F., Jr., U. Pitt. Law School, Pittsburgh 13.
Segal, Bernard G., 1719 Packard Bldg., Philadelphia 2.
Sheaffer, M. Clyde, 17 N. Front St., Harrisburg.
Sheridan, Michael H., Second Nat'l. Bk. Bldg., Wilkes Barre.

PENNSYLVANIA—Cont'd

Shertz, Robert H., Rm. 811, 225 S. 15th St., Philadelphia 2.
Shorall, George, 1212 Frick Bldg., Pittsburgh 19.
Smith, Frederick E., P. O. Box 108, Doylestown.
Snyder, Donn L., Commerce Bldg., Harrisburg.
Spofford, William R., 1035 Land Title Bld., Philadelphia.
Stevens, Lewis M., 1222 Western Svg. Fund Bldg., Philadelphia 7.
Stewart, Wallace D., 925 Pa. Station, Pittsburgh 22.
Umberger, Horace M., 1720 Hastings Mill, Bridgeville.
Unkovic, Nicholas, 747 Union Trust Bldg., Pittsburgh 19.
Votaw, Ernest N., 176 Colonial Drive, Chambersburg.
Walker, John M., 717 Oliver Bldg., Pittsburgh 19.
Wertz, Robert R., 525 Wm. Penn Place, Pittsburgh 30.
Wick, Henry M., Jr., 1211 Berger Bldg., Pittsburgh 19.
Wiest, W. Irvine, 4 W. Independence St., Shamokin.
Winokur, Morris J., 512 Market St., Nat'l. Bk. Bldg., Philadelphia 7.
Witney, George W., 1428 S. Penn Square, Philadelphia.
Young, Robert H., 2107 Fid. Phila. Tr. Philadelphia 9.

RHODE ISLAND

Bromage, Edward, Jr., 1013 Turks Head Bldg., Providence 3.
Colagiovanni, Fred, 619 Industrl. Bk. Bldg., Providence 3.
Faerber, Matthew J., 39 Bellevue Ave., Newport.
Moore, Cornelius C., 179 Thames St., Newport.
Weller, Horace L., 832 Industrial Tr., Providence 3.

SOUTH CAROLINA

Folk, Ernest L., III, Univ. S. Carolina Law School, Columbia.
Robinson, David W., Jr., 1213 Washington St., Columbia.

SOUTH DAKOTA

Farrar, John C., P. O. Box 1828, Rapid City.

TENNESSEE

Abshire, Patten, 924 Hamilton Nat'l. Bk. Bldg., Chattanooga 2.
Carpenter, Wm. F., 6th Fl. Amer. Tr. Bldg., Nashville.
Chambliss, Jac, Provident Bldg., Chattanooga 2.
Cochran, Carmack, 226 3rd Ave., N., 4th Fl., Nashville 3.
Egerton, N. W., P. O. Box 2047 Knoxville.
Key, C. W., P. O. Box 2066, Knoxville.

TENNESSEE—Cont'd

Goodman, Benjamin, Comm. Title Bldg., Memphis.
Heinemann, Charles B., Jr., 1717 West End Ave., Nashville 3.
Ivins, Richard N., 100 Highland Ave., Athens.
Jones, John Paul, 1012 Edway Bldg., Memphis 3.
McConnell, Robert M., P. O. Box 39, Knoxville 1.
Sanders, Paul H., Vanderbilt Law Schl., Nashville 4.
Sanford, Val, 811 3rd National Bk. Bldg., Nashville 3.
Taylor, Robert L., 208 Adams Ave., Memphis 3.
Todd, John Hart, P. O. Box 23, Memphis 1.
Wrape, James W., 2111 Sterick Bldg., Memphis 3.
Wall, Thomas P., Jr., 907 Clearview Drive, Nashville 5.

TEXAS

Acers, Maurice W., c/o T. E. C., Austin 19.
Armstrong, E. Taylor, 2700 Republic Bk. Bldg., Dallas 1.
Bailey, James Patrick, 2328 Bank of S. W. Bldg., Houston 2.
Barber, William A., Jr., P. O. Box 515, Texarkana.
Benckenstein, L. J., Suite 1117, Goodhue Bldg., Beaumont.
Binion, Jack, P. O. Box 1181, Houston 1.
Blakley, Wm. A., 1300 Exchange Bank Bldg., Dallas 35.
Bottler, Edgar O., P. O. Box 683, Houston 1.
Brin, Royal H., Jr., 300 Gulf States Bld., Dallas 1.
Callaway, Carl B., 305 Empire Bk. Bldg., Dallas 1.
Carp, Miss Elizabeth, 630 Fidelity Union Bldg., Dallas 1.
Christopher, T. S., 807 Cont. Life Bldg., Fort Worth 2.
Conrad, Frank W., 817 Mercantile Bank Bldg., Dallas 1.
Cook, W. Lawrence, Jr., 306 City Hall, Houston 2.
Corbett, Max A., 4318 Omera, Houston 35.
Davee, Robert C., Rudder Bldg., Brady.
Davis, N. Knowles, P. O. Box 2511, Houston.
Deakins, William D., Jr., 1145 Esperson Bldg., Houston 2.
Dougherty, John Chrys, 6 Green Lanes, Austin 3.
Everett, W. Hume, P. O. Box 3128, Houston.
Gay, Donald G., 1310 Kirby Bldg., Dallas 1.
Hall, Gordon, 3020 S. Haskell, Dallas.
Hall, John Esten, P. O. Box 2451, Wichita Falls.
Hallman, Leroy, 617 1st Nat'l. Bk. Bld., Dallas 1.
Harris, Whitney R., 8200 San Ferando W., Dallas 18.
Hartt, Hon. Grover, Jr., 101 Tower Petrlm. Bldg., Dallas 1.
Hoffman, Leo J., 1000 Merc. Dallas Bldg., Dallas 1.
Holloway, W. H., P. O. Box 2180, Houston 1.
Hulse, J. F., 1st Nat'l. Bk. Bldg., El Paso.

TEXAS—Cont'd

Humphreys, Joe Bailey, P. O. Box 6166, Dallas 1.
Illig, Carl, Law Dept., Humble Oil, Houston.
Jackson, John N., 1400 1st National Bk. Bldg., Dallas 2.
James, W. Ervin, 1107 S. Coast Bldg., Houston 2.
Johnson, Gillis A., 1500 Sinclair Bldg., Fort Worth 2.
Johnson, Myrlin O., P. O. Box 1269, Harlingen.
Kay, Harry E., 4700 Walnut Hill Lane, Dallas 20.
Kidwell, Rollo Eugene, 305 Empire Bank Bld., Dallas 1.
Lanham, Joe T., 1009 Perry Brooks Bldg., Austin 1.
Larson, Lennart V., Southern Methodist Univ., Dallas 5.
Lea, Willis L., Jr., 1100 Burt Bldg., Dallas 1.
Leffingwell, Frank A., 1515 Praetorian Bld., Dallas.
Lockett, J. L., 1114 Texas Ave., 14 F., Houston 2.
Long, Charles E., Jr., 4939 Brookview Drve, Dallas 20.
Martin, Mark, 300 Gulf States Bld., Dallas 1.
Mathews, Charles D., P. O. Box 858, Austin 65.
Matthews, Hugh T., Jr., 305 Empire Bank Bldg., Dallas 1.
Maxwell, Verne H., P. O. Box 2159, Dallas 21.
McDowell, Wm. Ralston, 1025 Elm St., Dallas 2.
Merrill, Bruce R., P. O. Box 2197, Houston 1.
Miller, Giles E., P. O. Box 866, Dallas 21.
Minks, Merle E., P.O. Box 2100, Houston 1.
Munn, Cecil Edwin, 2101 Ward Parkway, Fort Worth.
Muse, Ewell H., Jr., 415 Perry Books Bld., Austin.
Neary, William H., 2300 Republic Bk. Bldg., Dallas 1.
Nelson, Hal E., 5614 Ellsworth, Dallas 6.
Nelson, Otis E., Hamilton Bldg., Wichita Falls.
Newsom, Cecil P., P. O. Box 448, Dallas 1.
Olsen, Hon. G. C., 745 Hejupe Dr., Kermit.
Pace, John A., 1735 Republic Bk. Bl., Dallas 1.
Price, Hobart, Gulf States Bldg., Dallas.
Purnell, Maurice E., 1900 Rep. Nat. Bk. Bld., Dallas.
Red, Walter Scott, 647 Texas Nat'l. Bank Bldg., Houston 2.
Reid, Joe, 1500 Transit Tower, San Antonio 5.
Rice, J. P., 725 Mercantile Dallas Bldg., Dallas 1.
Richardson, John D., 317 Shell Bldg., Houston 2.
Row, Martin A., P. O. Box 2880, Dallas.
Ryburn, Frank M., Jr., 1511 Fid. Union Life Bldg., Dallas 1.
Sayers, Reagan, 304 Century Bldg., Fort Worth.
Scruggs, Jack A., 6127 Birchwood, Houston 36.
Settle, Peveril O., 1610 Contl. Life Bldg., Fort Worth 2.
Shook, John Louis, 1900 Republic Bk. Bg., Dallas 1.

TEXAS—Cont'd

Smith, Robert J., 3809 Shenandoah Ave., Dallas 5.
Stone, Harold Ben, P. O. Box 5115, Dallas 3.
Taylor, W. M., Jr., 4588 Belfort, Dallas.
Trotti, Robert S., 1300 Exchange Bank Bldg., Dallas 35.
Turner, J. Glenn, 1900 Merc. Dallas Bldg., Dallas 1.
Wadlington, Dewey R., 1901 C & I Life Bldg., Houston 2.
Walker, James Herbert, 1300 Exchange Bank Bldg., Dallas 35.
Watson, Alto V., 447 Orleans, Beaumont.
Wells, L. N. D., Jr., 1610 I. C. T. Bldg., Dallas 1.
White, Lewis, N., Esperson Bldg., Houston.
Wilson, Claude R., Jr., 914 Tex. Pacific Bldg., Dallas 2.
Winters, J. Sam, P. O. Box 858, Austin 65.
Woodfin, Gene M., 610 1st City Nat'l. Bk. Bldg., Houston 2.
Young, Frederick H., 706 W. 32nd St., Austin.

UTAH

Conder, Dean E., 510 Newhouse Bldg., Salt Lake City 11.
Dwyer, Robert G., 811 Kearns Bldg., Salt Lake City.
Elggren, C. Allen, 1311 Walker Bank Bldg., Salt Lake City 11.
Gustin, Harley W., 1007 Walker Bank Bldg., Salt Lake City 11.
McKay, David L., 720 Newhouse Bldg., Salt Lake City 11.
Mock, H. Byron, 1003 Contl. Bank Bldg., Salt Lake City 1.
Richards, Lynn S., 1403 E. South Temple, Salt Lake City.
Jones, Wendell Rockhill, 345 S. State., Salt Lake City.

VERMONT

Feen, A. Pearley, 119 S. Winooski Ave., Burlington.

VIRGINIA

Ablard, Charles D., 500 Queen St., Alexandria.
Bain, Jack Wilson, 2501 Hayes St., Alexandria.
Bivens, William J., 5930 9th St., N. Arlington 5.
Bond, J. D., 1415 N. Adams St., Arlington.
Boyd, T. Munford, Univ. of Virginia, Charlottesville.
Bryan, Herbert K., McLean.
Connor, Martin F., III, 2108 16th St., N., Arlington.
Cooper, Basil P., 4727 32nd St. N., Arlington,
Cox, J. Earl, 9013 Elmdale Road, Alexandria.
Curry, John, 410 Cleve Drive, Falls Church.
Curtin, John J., Jr., 1535 Mt. Eagle Pl., Alexandria.
Cushman, John F., 817 Larchwood Road, Falls Church.
Cutler, Robert G., 3915 N. 5th St., Arlington 3.
Delaney, Paul Lyne, 115 N. Fairfax St., Alexandria.

VIRGINIA—Cont'd

Donaldson, Allyn C., 2405 S. Joyce St., Arlington 2.
Dougherty, Ray E., 309 Plum St., Vienna.
Easton, Col. William G., 2020 George Mason Dr., Alexandria.
Eberhart, David C., 3101 Mosby St., Alexandria.
Edney, Fred R., 6601 Broad St. Road, Richmond 18.
Edwards, Adolph M., Jr., 4200 N. 31st St., Arlington 7.
Fairbank, John J., Jr., 519 Mutual Bldg., Richmond.
Feiler, Sidney L., 742 S. 26th St., Arlington 2.
Fishwick, John Palmer, Norfolk Western Ry., Roanoke.
Fritz, Edmund T., 604 N. Overlook Dr., Alexandria.
Grandey, Charles E., 2808 N. Underwood St., Arlington 13.
Griffin, Thomas J., 1701 Fairlawn Dr., McLean.
Hale, Matthew, 918 Timber Branch Pkwy., Alexandria.
Hall, Francis L., 1800 N. Edgewood St., Arlington 1.
Hardy, Claire W., 700 E. Jefferson St., Charlottesville.
Harff, Leroy Martin, 3055 Military Road, Arlington 7.
Harmanson, Lewis J., Jr., 3607 N. Nelson St., Arlington 7.
Harvey, John L., 109 S. Fairfax St., Alexandria.
Heilprin, Richard A., 1200 S. Court House Rd. Arlington 4.
Hyden, H. Edward, 4618 S. 31st Road, Arlington 6.
Johnson, William Bowie, 813 Ridge Road, Annandale.
Jones, Lt. Col. J. Fielding, 3308 N. Geo. Mason Dr., Arlington.
Kabeiseman, Karl W., 1002 Valley Drive, Alexandria.
Kahn, Fritz R., 2726 Donna Circle, Annandale.
Kaplan, Louis C., 3082 S. Abingdon, Apt. A-1, Arlington 6.
Keen, Paul E., 209 W. Greenway Blvd., Falls Church.
Levin, Col. Maurice, 2300 N. Richmond St., Arlington 7.
Light, Charles P., Jr., 305 Jackson Ave., Lexington.
Lisi, Thomas, 120 N. Columbus St., Arlington.
Margraf, Gustav B., Reynolds Metals Bldg., Richmond 26.
MacDonald, Charles T., 1125 Marlan Drive, Alexandria.
Mayer, Jacob W., 1400 N. Meade St., Apt. 202, Arlington 9.
McCarty, Robert L., 65 Woodmont Road, Alexandria.
McCauley, Daniel J., Jr., 2507 Crest St., Alexandria.
McFarland, Carl, Route #2, Garth Road, Charlottesville.
Murphy, Robert H., 4132 N. 34th St., Arlington.
Myers, Col. William M., 316 Rosemary Lane, Falls Church.

VIRGINIA—Cont'd

Nash, Ernest, 2002 N. Nottingham St., Arlington 5.
Parker, Joseph O., 4026 25th St. N., Arlington.
Patterson, Donald M., 2026 Columbia Pike, Apt. 9, Arlington 4.
Pickard, Howard B., 3109 N. Nelson St., Arlington 7.
Rand, Joseph, 6902 Pinetree Terrace, Falls Church.
Rowley, Worth, 100 Taylor Drive, Fairfax.
Ruhlen, F. Merritt, 8006 Overlook Drive, Alexandria.
Sands, M. Reynolds, 3026 N. Peary St., Arlington 7.
Slayman, Charles H., Jr., 611 S. Fairfax St., Alexandria.
Smoak, Lt. Col. Marion H., M-1014 Arlington Towers, Arlington 9.
Spector, Louis, 6710 Joallen Dr., Falls Church.
Sutherland, Donald R., 1403 Wayne Drive., Annandale.
Tincher, William R., 650 Rose Lane, Annandale.
Verner, James M., 3618 N. Nelson Street, Arlington 7.
Walkup, Comdr. H. A., 2404 Davis Ave., Alexandria.
West, Bland, 2808 S. Joyce St., Arlington 2.
Wheatley, Charles F., Jr., Hallowing Point Estate, Lorton.
White, Philip, 1222 Nat'l. Bk. Com. Bldg., Norfolk 10.
Williams, Lawrence H., 6905 Phyllis La., Alexandria.
Wilson, Perkins, 1003 Electric Bldg., Richmond 12.
Wollenberg, J. Roger, 508 Lincoln Ave., Falls Church.

WASHINGTON

Bantz, William B., 4th Fl. Symons Bldg., Spokane 4.
Burdell, Charles S., 929 Logan Bldg., Seattle 1.
Cheadle, J. Kennard, Old Nat. Bk. Bldg., Spokane 8.
Coleman, Clarence J., 415 1st Nat'l. Bank Bldg., Everett.
Crosby, Roger J., 909 Smith Tower, Seattle 4.
Dorsey, Eli E., Northern Life Tower, Seattle.
Gaiser, Daniel W., 1224 Old Nat. Bk. Bld., Spokane 8.
Garver, Robert W., Jr., 231 N. E. 3rd St., Camas.
Grey, Wheeler, 610 Colman Bldg., Seattle 4.
Hart, George H., 3144 W. Laurelhurst Dr., Seattle 5.
Jonson, Carl A., 400 Central Bldg., Seattle 4.
Karr, Payne, 1210, 1411 4th Ave., Seattle.
Luce, Charles F., 206 1st Nat'l. Bk. Bldg., Walla Walla.
MacBride, Thomas H., 812 Hoge Bldg., Seattle 4.
Mickelwait, Lowell P., 1006 Hoge Bldg., Seattle 4.
Morrow, Thomas L., 603 Central Bldg., Seattle 4.
Murray, E. K., 1012 Rust Bldg., Tacoma 2.
Myers, Smithmoore P., Gonzaga University, Spokane.

WASHINGTON—Cont'd

Neibel, Oliver J., Jr., 1309 Smith Tower, Seattle 4.
O'Gorman, Robert, 2018 Smith Tower, Seattle 4.
Peck, Cornelius J., University of Washington, Seattle 5.
Riddell, Charles F., 1411 4th Ave. Bldg., Seattle 1.
Schweppe, Alfred John, 657 Colman Bldg., Seattle 4.
Sherwood, Cameron, 601 Baker Bldg., Walla Walla.
Stephan, Albert E., 711 Central Bldg., Seattle 4.
Sutherland, Patrick D., Insurance Bldg., Olympia.
Washington, Nat. W., P. O. Box 865, Ephrata.
Yencopal, Albert J., 709 Thayer, Richland.
Zabel, Oscar A., 518 Fourth X Pike, Seattle 1.

WEST VIRGINIA

Campbell, Rolla D., P. O. Box 2187, Huntington.
Estep, Charles L., Logan.
Galbraith, Carl B., 905 Riley Law Bldg., Wheeling.
Garden, G. Alan, 1226 Chapline St., Wheeling.
Hyre, Lycurgusy, Upshur Bldg., Buckhannon.
Heinish, Ned O., 1302 Washington, Huntington 4.
McCamic, Jay T., 56 14th St., Wheeling.
Spillers, C. Lee, 800 Riley Law Bldg., Wheeling.

WISCONSIN

Andrus, Elwin A., 735 N. Water St., Milwaukee 2.
Axley, Ralph E., 1005 Power & Light, Madison 3.
Calhoun, John William, 104 S. Main St., Rm. 706, Fond Du Lac.
Crownhart, C. H., Jr., P. O. Box 1109, Madison.
Ewens, Robert A., 633 N. Water St., Milwaukee 2.
Gram, Laurence C., 7008 W. Greenfield, West Allis 14.
Heft, Carroll R., P. O. Box 205, Racine.
Houghton, Albert B., 152 W. Wisconsin Ave., Milwaukee.
Hoyt, Ralph M., 928 1st Wis. Nat. Bk., Milwaukee.
Ihrig, H. William, 759 N. Milwaukee St., Milwaukee 2.
Jasper, Claude J., 110 E. Main St., Madison 3.
Kamps, John G., 411 E. Mason St., Milwaukee 2.
Klein, Lloyd J., 1121 N. Waverly Place, Milwaukee 2.
Kramer, John N., Heberlein Bldg., Fennimore.
O'Meara, Stephen, 206 N. Main St., West Bend.
Porter, James D., 622 North Water St., Milwaukee 2.
Rogers, Harlan B., Portage.
St. Peter, George M., 20 Forest Avenue, Fond Du Lac.
Torkelson, William E., 4157 Manitou Way, Madison 5.
Wright, Fred R., 312 E. Wisconsin Ave., Milwaukee.

WYOMING

Case, Sterling A., 715 E. 17th, Cheyenne.
Lane, Charles Elmer, 1717 Warren Ave., Cheyenne.

PUERTO RICO

Marchan, Victor M., P. O. Box 9421, Santurce.

CANADA

Abel, Albert S., 9 Wilberton Road, Toronto 7, Ont.

FRANCE

Becker, Loftus E., 52 Ave des Champs Élysees, Paris 8.

GERMANY

Potter, Franklin J., 21 Taunus Anlage, Frankfurt A. M.
Riegert, Robert A., Akademiestr 6, Heidelberg.